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February 13, 2012¹

The Honorable Ken Salazar,
Secretary of the Interior
U.S. Department of the Interior
1849 C Street, N.W. (MS-2462)
Washington, D.C. 20240

Jon Jarvis, Honorable Director
National Park Service
1849 C Street, N.W.
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National Park Service
San Gabriel Watershed and Mountains SRS
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RE: Support Improved Alternative D *San Gabriel Watershed and Mountains Special Resource Study and Environmental Assessment* (September 2011 Draft)

Dear Secretary Salazar and Director Jarvis:

I. Overview

We submit these public comments regarding the *San Gabriel Watershed and Mountains Special Resource Study (Special Resource Study or Study)* on behalf of diverse allies who are committed advocates for equal justice, public health and the built environment. Collectively, our goal is to diversify access to and support for the San Gabriel Mountains, the San Gabriel River, and units of the National Parks and Forests systems generally, and to support an enhanced Alternative D specifically.

We commend the National Park Service (NPS) for including an “Environmental Justice Impact Analysis” (pp. 231-32) and an assessment of the “Adequacy of Park and Recreation Areas in the Study Area” in the draft Study (pp. 218-20). We applaud NPS for addressing social equity, human health, economic vitality and job creation, and cultural and spiritual values in addition to impacts on the natural environment in developing the alternatives presented in the *Special Resource Study*.

¹ These comments update our January 9, 2012, comments.

Creating a National Recreation Area (NRA) in the San Gabriel Mountains and Watershed is of vital importance for physical activity, human health, and environmental justice and quality in Southern California for all people, including people of color and low-income people. As the *Special Resource Study* notes, park access is a significant issue for many residents of the San Gabriel Valley and other regions surrounding the San Gabriel Mountains. NPS deserves much credit for highlighting the fact that “people of color are less likely to have adequate access to parks in the Los Angeles area” and the health disparities that accompany park access disparities (p. 219).

Indeed, NPS has recently emphasized that “[p]eople of color and low income populations still face disparities regarding health and access to parks.” “In regard to obesity, 36 percent of black and 35 percent of Hispanic high school students nationwide are overweight or obese, while 24 percent of non-Hispanic white high school students suffer from these conditions.” NPS, *Healthy Parks, Healthy People US Strategic Action Plan (Nov. 2011) (the HP/HP Plan)*, p. 4. There is more to human health than reducing obesity. As NPS emphasizes, the World Health Organization defines health as a state of complete physical, mental and social well-being, and not merely the absence of disease or infirmity. *HP/HP Plan*, p. 8.

It is noteworthy that President Barack Obama’s *America’s Great Outdoors* initiative has targeted improvements along the San Gabriel and Los Angeles Rivers as one of the top 101 outdoor projects in the nation, only two per state. The San Gabriel River watershed lies within the proposed NRA. The NRA and AGO report both provide NPS the opportunity to improve green access for all in the San Gabriels region.

We believe that of the options presented, Alternative D best promotes our vision for an NRA in the San Gabriel Mountains and Watershed. We are particularly heartened to see that Alternative D seeks to “improve recreational access and opportunities in urban areas that are deficient in recreation by offering assistance in planning . . . better trail access, and improved public transportation options to recreational areas.” (p. 186). We agree with NPS’s assessment that, of the alternatives presented in this study, Alternative D “holds the greatest potential benefit for socially and economically disadvantaged populations.” (p. 232). We strongly support effective “job training and conservation stewardship programs for youth and nearby community members” (p. 188) and expanded educational and interpretive programs proposed in Alternative D. We appreciate that under Alternative D, NPS will provide technical and planning assistance to local public agencies and organizations to create a network of parks and trails in the urban communities surrounding the San Gabriel Mountains.

Paco Serrano, a Highland Park youth advocate with the Anahuak Youth Sports Association, will drive three hours to go hiking and camping in Lake Isabella in the heart of the Kern River Valley, but he has never been to the Angeles National Forest or the San Gabriel Mountains, less than an hour away. Mr. Serrano joins in our work to support a proposed national recreation area there. “I think it’s important to take children to the San Gabriel Mountains so they can see that nature is free to them. They will begin to appreciate the mountains for themselves. Many people in my community don’t know of the opportunities provided in the San Gabriel Mountains.”

The improved NRA presents an unprecedented opportunity to implement a national best practice example for residents of park poor neighborhoods to gain access to places for healthy outdoor recreation. We encourage NPS to strengthen the draft Alternative D in the ways discussed below and summarized in Section VI.

II. Equal Justice Laws and Principles Govern the Proposed NRA

The proposed NRA offers NPS an opportunity to implement equal justice laws and principles that NPS and the Department of Interior have recently reiterated in various publications, including the *Special Resource Study* itself as well as the *HP/HP Plan; A Call to Action: Preparing for a Second Century of Stewardship and Engagement* (Aug. 2011), and the Department of Interior draft *Environmental Justice Strategic Plan*.²

We commend NPS for including the section “Impact Analysis – Socially or Economically Disadvantaged Populations Socioeconomic Impacts (Environmental Justice)” in accordance with the President’s Order on Environmental Justice, Executive Order 12898. As the *Special Resource Study* states, the Order requires agencies to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” *Study*, pp. 231, *quoting* Executive Order 12898 § 1-101 (Feb. 11, 1994); *see also id.*, §§ 1-102, 6-604.

Other federal civil rights laws and principles are also relevant. Specifically, for example, Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000d - 2000d-4a, ensures equal access to public resources by prohibiting recipients of federal financial assistance (such as state, regional or local park agencies and environmental organizations) from discriminating on the basis of race, color, or national origin in their programs or activities. The Department of the Interior, like other federal agencies, has enacted regulations to implement Title VI. 43 C.F.R. § 17.3. Title VI and its regulations prohibit both intentional discrimination, as well as unjustified discriminatory impacts for which there are less discriminatory alternatives, regardless of intent.

Thus, the NPS report *A Call to Action* commits NPS to “fully represent our nation’s ethnically and culturally diverse communities. To achieve the promise of democracy, we will create and deliver activities, programs, and services that honor, examine, and interpret America’s complex heritage” (p. 5). NPS will foster civic dialogue about the stories of the civil rights movement found within the parks. NPS will commemorate significant 50th anniversaries of the civil rights movement. NPS will “connect urban communities to parks, trails, waterways, and community green spaces that give people access to fun outdoor experiences close to home,” and to “welcome

² Diverse allies submitted public comments on environmental justice, park access and human health to DOI and NPS regarding the draft *HP/HP Plan* on July 29, 2011, and on the *Environmental Justice Strategic Plan* on November 30, 2011, and December 20, 2011. We urge NPS to consider those comments given their relevance to the proposed NRA. The comments are available on the web at www.cityprojectca.org/blog/archives/12550.

and engage diverse communities through culturally relevant park stories and experiences that are accessible to all” (p. 11). NPS addresses the need for diverse, inclusive, culturally competent workforce (p. 22). NPS cites the need to serve communities with the least access to parks. (p. 12).

NPS needs to proactively comply with these legal mandates by ensuring equal access to the proposed San Gabriel NRA through its own actions and the actions of the recipients of its federal financial assistance. Alternative D as modified by the recommendations in the present comments advance these environmental justice goals.

III. Patterns of Disparities in Park Access and Human Health

Park Access and Disparities

We commend NPS for addressing park access and health disparities in the *Special Resource Study*. The Study highlights the fact that “Los Angeles County is one of the most disadvantaged counties in terms of access to parks and open space for children of color and people of color,” (p. 219). Extensive research studies by the United States Forest Service, The City Project, and others support this conclusion.

Visitation data for Angeles National Forest, which covers a large portion of the San Gabriel Mountains, for example, shows that more than 47% of the population of Los Angeles County and approximately 50% of the population of the San Gabriel Valley is Latino, but only 11% of visitors to the Angeles Forest are Latinos. Nearly 10% of the residents are black, yet only 1% of the visitors to the forest and 0% of visitors to the forest’s wilderness areas are black. Asians account for an estimated 25% of the total population of the San Gabriel Valley, yet only 4.5% of visitors to the Angeles are Asian.³ On the national scale, the U.S. Forest Service reports that over 90% of visitors to all national forests are non-Hispanic white, while less than 5% are Latino, less than 2% are Asian, and only 1% are African American.⁴

This pattern extends beyond national forest and park lands. For example, the 2006 United States Census Bureau report *A Child’s Day* found that 87% of non-Hispanic white respondents reported “there are safe places for children to play” in their neighborhood, while only 68% of Latinos, 71% of African Americans, and 81% of Asians agreed with the same statement. Almost half (48%) of Latino children under 18 in central cities were kept inside as much as possible because their neighborhoods were perceived as dangerous. The same was true for more than 39% of black children, 25% of non-Hispanic white children, and 24% of Asian children.⁵

³ Race/Ethnicity of Visitors to the Angeles National Forest (2000 Survey). Source: U.S. Forest Service, www.losangelesalmanac.com/topics/Parks/pa07.htm.

⁴ U.S. National Forest Service, *National Visitor Use Monitoring Results*, page 8, Table 4 (2009), www.fs.fed.us/recreation/programs/nvum/nvum_national_summary_fy2009.pdf.

⁵ U.S. Census Bureau, *A Child’s Day 2003: Selected Indicators of Child Wellbeing*, (2007), www.census.gov/population/www/socdem/wellbeing.html.

Why are the visitation rates low for people of color to the Angeles National Forest? With all due respect, that is a pattern often seen in national forest and park lands.

The findings are instructive of the study on environmental justice and the Golden Gate National Recreation Area recently published by Prof. Nina Robertson and Tendai Chitewere.⁶ The Golden Gate National Recreation Area (GGNRA), one of the most highly visited national parks in the United States, is an important cultural symbol in the San Francisco Bay Area, California and the nation. Traditionally absent groups are expressing a desire to enjoy the benefits associated with outdoor recreation in public lands including national recreation areas. Understanding how national parks are used by different racial and ethnic groups is of vital importance to the public and NPS. While identifying physical, mental, and spiritual benefits of access to nature in parks, many participants expressed frustration with limited physical access, subtle racism, and general exclusion from the culture of parks as reasons why they avoid these public spaces. The results of this study corroborate over four decades of research on park constraints. An improved Alternative D can address these concerns.

Human Health Disparities

The *Special Resource Study* correctly points out that “the communities with the least amount of access to parks and open space tend to have higher rates of childhood diseases related to obesity such as diabetes.” (p. 219). This is true nationally, as well as locally in the San Gabriel Valley and Los Angeles region. The human health effects resulting from disparities in park access also go beyond obesity to include a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity, as emphasized by the World Health Organization and NPS’s *HP/HP Plan*. The NRA should serve diverse needs and the full range of values at stake through a fully funded, balanced NRA that includes hiking, biking and camping as well as active recreation including soccer, baseball and other sports fields, complete green streets with biking trails and safe routes to school, and the joint use of parks, schools and pools within the NRA. For example, the San Gabriel River Bike Trail is a Class I trail that runs 40 miles from the mountains to the Pacific Ocean and serves as a best practice example for urban bike trails. See blog post, *San Gabriel River Bike Trail -- and National Recreation Area!*, www.cityprojectca.org/blog/archives/12942.

According to Nelson Trujillo, a resident of East Los Angeles, “There is no safe place for outdoor recreation where I live. It’s dangerous. I think physical activity will improve the health of my children, keep them safe, healthy and out of trouble.”

Martin Nava of Old Timers' Foundation testified before Secretary Ken Salazar, Administrator Lisa Jackson of the Environmental Protection Agency, and Chair Nancy Sutley of the White House Council on Environmental Quality on July 7, 2010, at Whittier Narrows. “[W]e provide a

⁶ Nina S. Roberts, Tendai Chitewere, *Speaking of Justice: Exploring Ethnic Minority Perspectives of the Golden Gate National Recreation Area*, *Environmental Practice* 13 (4), 354 (Dec. 2011).

wide range of services in the Southeast area of Los Angeles. It is an area where over 90% of the population is Latino, over 20% live below the federal poverty level, and 1 in 3 of our adolescents are obese. Obesity is directly related to high rates of diabetes. . . . We repeatedly see that our youth do not have enough green spaces in our local cities for healthy recreation options. Many children are not allowed to ride their bicycles in their neighborhoods because parents often fear the dangers that exist in low-income communities. It is not a coincidence that these areas are also incredibly park-poor; according to a study conducted by The City Project, we service an area where there is less than one acre of green space per 1,000 people. The San Gabriel Mountains comprise 70% of L.A. County's open space yet, currently, the population visiting the San Gabriel Mountains is not reflective of the people living in Los Angeles; it is whiter and more affluent. The San Gabriel Mountains should be accessible to anyone who is willing to explore the hidden greatness of the San Gabriel's."⁷

The City Project has extensively analyzed the environmental justice and Title VI implications of park and health disparities, most recently in its 2011 policy report *Healthy Parks, Schools and Communities: Green Access and Equity in Southern California*. The report is a case study of nine counties that includes GIS mapping and demographic analyses, evidence based social science research and participatory community based research. As documented in the report in ways that are relevant for the proposed NRA:

- Children of color living in poverty with no access to a car have the worst access to places for physical activity in parks and other green space. They suffer disproportionately from higher levels of obesity and diseases related to the lack of physical activity. *Id.* at 9-12, 26-111. One's health is determined by where one lives, the color of one's skin, and the amount of money one has, more than the amount spent on health care or individual choices.
- Proximity to parks and recreation tends to support increased physical activity. *Id.* at 19- 21.
- Park disparities are not an accident of unplanned growth, an efficient market in land, or rational choices maximizing personal utilities. Park disparities reflect a legacy and pattern of discriminatory land use, housing, education and economic policies dating back to the New Deal and beyond. *Id.* at 112-21.
- Park and health disparities in Southern California are consistent with broader patterns across the nation. *Id.* at 9-12.
- The report analyzes the myriad values at stake in equal access to park and health resources. *Id.* at 19-25.
- The report analyzes park and health disparities under civil rights laws and principles, including Title VI and the President's Order on Environmental Justice. *Id.* at 122-23.
- The report presents recommendations for change that are generally applicable to DOI and NPS. *Id.* at 125-26.

We respectfully refer NPS to the cited sections of this report, which is available on the web at www.cityprojectca.org/greenjustice.

⁷ Mr. Nava's comments available on YouTube at www.cityprojectca.org/ourwork/great-outdoors.html.

The studies above demonstrate that access to green space, and the health, economic, environmental and other benefits parks can provide, are environmental justice and civil rights issues, and those concerns can be addressed through Alternative D and the recommendations in these comments.

IV. The Values at Stake in Creating a National Recreation Area

We applaud the National Park Service for embracing the diverse values at stake in the *Special Resource Study*, as well as in other recent reports, such as the November 2011 *HP/HP Plan* and the August 2011 *Call to Action*. We agree that Alternative D “would have a greater beneficial effect on public health for communities throughout the region” (p. 223) and “would allow for coordinated interpretive and educational opportunities throughout the study area, providing the greatest beneficial effects on the visitor experience.” (p. 222).

NPS embraces the diverse values at stake in the *HP/HP Plan*, including: (1) democratizing clean air, clean water and outdoor enjoyment for the health and inspiration of all people; (2) encouraging healthy participation by people of diverse backgrounds and different demographics; and (3) equitable access to open spaces and natural places (pp. 4, 8). “As champions of people’s health and of our local, state, and national park system, we’ve come together to affirm our shared belief in the power of nature to improve the lives and well-being of all Americans.” *Id.* at 7.

Academics, the U.S. Forest Service and others have analyzed how different races and cultures use parks and other natural public places differently.⁸ Decades of evidence-based social science research show that parks and recreation promote diverse values. Parks and recreation may contribute to psychological well-being, encourage social cohesion, offer alternatives to at risk behavior including gangs, crime drugs and violence, provide opportunities to celebrate cultural diversity, and inspire a spiritual connection with nature. Providing the sheer delight of being in the park is of overarching significance to healthy parks and people. Parks and green space promote conservation values of clean air, land and water, habitat protection, and climate justice.

NPS “should emphasize the fun of health promotion and parks,” as NPS writes in *HP/HP* at 18. We support the simple joys of playing in the NRA.

⁸ See generally Deborah J. Chavez, *Mexican-American Outdoor Recreation: Home, Community & Natural Environment*, proceedings paper, Hawaii International Conference on Social Sciences 5, 41-43 (2003); Deborah J. Chavez, *Adaptive Management in Outdoor Recreation: Serving Hispanics in Southern California*, 17 (3) *West. J. Applied Forestry* 132 (July 2002); Deborah S. Carr & Deborah J. Chavez, *A Qualitative Approach to Understanding Recreation Experiences: Central American Recreation in the National Forests of Southern California in Culture, Conflict, and Communication in the Wildland-Urban Interface* 181, 184-94 (A.W. Ewert, D.J. Chavez, A.W. Magill eds., 1993); Patrick T. Tierney, et al., USDA, Forest Service, Pacific Southwest Research Station, *Cultural Diversity of Los Angeles County Residents Using Undeveloped Natural Areas* 5 (1998). See also Alison H. Deming & Lauret E. Savoy, ed., *The Colors of Nature: Culture, Identity, and the Natural World* (2002); Setha Low, Dana Taplin, & Suzanne Scheld, *Rethinking Urban Parks: Public Space and Cultural Diversity* 40-43 (2005).

Jobs and Economic Vitality

Parks can serve to get unemployed and underemployed people back to work, to strengthen the economy, and to build their own feelings of confidence and self-worth. Raul Macias, Founder and Director of Anahuak Youth Soccer Association, a community-based organization serving children and families living near the study area points out, “There are many youth that can obtain green jobs, over the weekend, or part time. It would be a smart thing to do. Youth who are incarcerated and released from jail don’t have any options for work. This could create good opportunities if the resources were to be made available. If we invest in youth now, it can save many thousands of dollars and it would be good practice to do so.”

We are in the worst economic crisis since the Great Depression, with record unemployment rates. Latinos and African Americans have been the worst hit by joblessness and drops in median wealth. Programs like the Civilian Conservation Corps, including local green jobs and apprenticeships that could lead to careers based on the diverse values at stake in conservation, enable people to be outdoors and physically active and healthy while providing service to their country and earning a pay check. Increasing visitation to national parks would benefit a wide range of businesses outside the parks. The Civilian Conservation Corps was one of the most successful New Deal programs, appealing across the political spectrum while creating millions of jobs, planting billions of trees, and increasing visitors to National Parks by over 600%. If you want parks, work for jobs – and justice. *NPS needs to ensure that the NRA provides extensive local green jobs, apprenticeship programs and career opportunities that reflect the diversity of the surrounding region.*

Conservation Values

People of color care deeply about the natural environment, as empirical studies demonstrate. A November 2010 poll conducted by the University of Southern California and the Los Angeles Times found that Latino and Asian voters throughout California are significantly more concerned about core environmental issues, including global warming and pollution, than non-Hispanic whites.⁹ The study is particularly significant because it allowed voters to answer questions in their native language, and thus was able to reach a more diverse pool of respondents than an English-only poll.

This suggests that culturally appropriate programs and facilities including interpretive elements in Spanish and English would engage more visitors to national park lands and the NRA. Pedro Chavez, a resident of Glassell Park, favors signage and programs in English and Spanish in the NRA “because there are many people who don’t speak English.”

The report on America’s Great Outdoors prioritizes improvements along the San Gabriel and Los Angeles Rivers as one of the top 50 projects in the nation, but the report has very little

⁹ Louis Sahagun, *Latinos, Asians More Worried about Environment than Whites, Poll Finds*, L.A. Times, November 20, 2010.

information about the San Gabriel River. As part of the planning process, NPS should analyze the demographics of life along the river to serve both the NRA and AGO needs. For example, the three mile radius along the San Gabriel River is complex demographically. There is a higher percentage of Hispanics and Asian/Pacific Islanders compared to the county as a whole. A higher percentage of people live in poverty. The percentage of people with a high school education or less is greater. However, the median household income is higher, and a higher percentage have access to a car. *See generally* The City Project's 2011 report *Healthy Parks, Schools and Communities: Green Access and Equity in Southern California*, at 30-31.

NPS needs to ensure that people as well as the environment benefit from river revitalization. The City of Los Angeles council passed a council resolution and issued a report on the L.A. River to do just that, *Los Angeles River Access and Use: Balancing Equitable Actions with Responsible Stewardship (2009)*. That approach is a best practice example for revitalizing the San Gabriel River through clean water justice, as are the recommendations in these comments. *Id.* at 30.

Culture, Art and History

Cultural, art and heritage sites, and Native American sites, need to be celebrated and preserved. NPS should conduct a thorough survey of relevant places within and adjacent to the NRA that celebrate diversity, democracy and freedom.¹⁰ Thus, for example, the Haramokngna American Indian Cultural Center lies in the Angeles National Forest and features a museum, gallery, and activity space. People of Gabrieleño/Tongva, Chumash, Fernandeño/Tataviam, Kitanemuk, and Serrano descent gather here to share culture, history and pride.¹¹

Robert Bracamontes, a member of the Acjachemen Nation / Juaneno tribe, addressed in person Secretary Ken Salazar, Administrator Lisa Jackson of the Environmental Protection Agency, and Chair Nancy Sutley of the White House Council on Environmental Quality, on the need for the NRA process to include Native Americans at every step of the way in his presentation at a listening session for the *America's Great Outdoors* initiative on July 7, 2010, at Whittier Narrows, CA. According to Mr. Bracamontes, "In the end, all of us here today are talking about our relationship to the land. And for the Indigenous People it is very different. The most important message here is that we are on Tongva land. They are the people who should be making the decisions about their land and the sacred sites on it. This should include both non-federally recognized and recognized tribes. I support a National Recreation Area that includes indigenous input every step of the way."¹²

The Juan Bautista National Historic Trail, the Old Spanish Trail, and the original San Gabriel

¹⁰ The report *Five Views: An Ethnic Historic Site Survey for California* is a best practice example. The report is available on the NPS web site at www.cr.nps.gov/history/online_books/5views/5views.htm.

¹¹ Pukuu, Cultural Community Services, *Haramokngna American Indian Cultural Center*, (2011), www.haramokngna.org.

¹² Mr. Bracamontes's comments were published in *Native Unity on the Web* at www.cityprojectca.org/blog/archives/5737. A video of his presentation is available on YouTube at www.cityprojectca.org/ourwork/great-outdoors.html.

Mission lie within the proposed NRA and should be celebrated for the contributions of Spanish, Mexicans, Californios and Native Americans to the region.¹³

The sites of WW II Japanese relocation assembly centers at the Santa Anita racetrack and the Pomona County fairgrounds lie near the proposed NRA, and could readily be incorporated. See, for example, the excellent NPS study *Japanese Americans in World War II*, available at www.nps.gov/nhl/themes/JPNAmericanTS.pdf.

The Owen Brown Grave Site is located in the San Gabriel Mountains and may fall within the proposed NRA. Owen Brown took part in the slave rebellion at Harper's Ferry, Virginia, in 1859 led by the radical abolitionist John Brown. Owen Brown found tranquility in the San Gabriels when he moved there with his family in 1884. Matt Horman, *An Anti-Slavery Warrior Found Tranquility in the San Gabriels*, Altadena Patch, Dec. 30, 2010, available at bit.ly/zkGvIO.

Equal Justice, Democracy and Livability for All

Equal justice, democracy and livability for all underlie each of these other values. Thus, for example, Jackie Robinson through sports helped abolish segregation in the United States years before *Brown v Board of Education*. Parks have been traditional First Amendment forums for free speech and unpopular speakers. The civil rights laws and principles discussed above reflect these cross-cutting principles of equal justice, democracy and livability for all.

The values at stake in seeking environmental justice regarding greens space including national park lands have been analyzed extensively in The City Project's 2011 policy report *Healthy Parks, Schools and Communities: Green Access and Equity in Southern California* at 19-25.

V. Public Transportation and Transit to Trails

As the *Special Resource Study* correctly points out, park and health disparities are exacerbated by a lack of transportation options. Therefore, it is of critical importance that planning for this NRA incorporates transportation planning, including public transportation.

We strongly encourage NPS to implement a Transit to Trails program to take urban youth on fun, educational and healthy hiking, biking and camping trips to mountains, rivers and other natural green spaces for no or low cost. A Transit to Trails program should incorporate education about land, water, wildlife, and cultural history, and the importance of physical activity and healthy eating for life-long health.

As discussed in the case study on page 179 of the *Special Resource Study*, a Transit to Trails pilot project currently provides trips to the Santa Monica Mountains National Recreation Area and other green spaces in the western portion of Los Angeles County. This pilot program was

¹³ See www.nps.gov/juba/index.htm and www.nps.gov/olsp/index.htm.

developed through a creative collaboration that includes NPS, Mountains Recreation and Conservation Authority, The City Project, and community groups including Anahuak Youth Sports Association and others. Secretary of the Interior Dirk Kempthorne hiked with Anahuak youth on a Transit to Trails trip in April 2007.

Drawing on lessons learned from the pilot program in the Santa Monica Mountains National Recreation Area, a San Gabriel Region NRA Transit to Trails program will greatly benefit young people in the surrounding urban communities, many of who have never visited the San Gabriel Mountains. A Transit to Trails program will not only provide short term benefits to the people getting to experience a trip to the NRA but also promotes a life-long love of healthy outdoor recreation and helps create a new generation of environmental stewards. According to Raul Macias of Anahuak Youth Soccer Association, a Transit to Trails program “would be ideal. . . . There are many shuttles for example that take you to the airport for nearly free. These kinds of services would be great to reach the mountains These services need to reach our communities and take them directly to the mountains.”

The Southern California Association of Governments (SCAG) calls for public transportation to improve access for all to parks throughout Southern California in its 2008 *Regional Transportation Plan (RTP) Environmental Justice Report*. “Public parks serve all residents. . . . However, not all neighborhoods and people have equal access to these public resources,” including national parks and forests. “[A] multi-agency effort must be undertaken in order to further address and remedy the issue of inequity of park access.” See SCAG *RTP Environmental Justice Report* 11- 14, 24 (2008), available at www.cityprojectca.org/blog/archives/880.

There is no good way to reach the forests and mountains in the Los Angeles region using transit.¹⁴ Transit to Trails will help.

VI. Recommendations

A National Recreation Area in the San Gabriel Mountains and Watershed will be a vital part of the infrastructure for healthy, livable, and just communities. The recommendations for strengthening Alternative D in the final *Special Resource Study* we have provided throughout these comments are summarized below.

1. Create local green jobs that reflect the diversity of the region through training, apprenticeship and stewardship programs for youth and local residents.
2. Implement Transit to Trails programs to take urban youth and their families and friends on fun, educational and healthy hiking, biking and camping trips to mountains, rivers and other natural green spaces for no or low cost. A Transit to Trails program should incorporate education about land, water, wildlife, and cultural history, and the importance

¹⁴ See Ron Frescas, Chris Martin, and Christine Steenken, University of Southern California, *Public Transportation to Local National Forests* (2004), available at <http://cityprojectca.org/pdf/usctransitstudy-forests.pdf>.

- of physical activity and healthy eating for life-long health.
3. Serve diverse needs and the full range of values at stake through a fully funded, balanced NRA that includes hiking, biking and camping as well as active recreation including soccer, baseball and other sports fields, complete green streets with biking trails and safe routes to school, and the joint use of parks, schools and pools within the NRA.
 4. Study, celebrate and preserve cultural, heritage and public art sites, and Native American sites. NPS should conduct a thorough survey of relevant places within and adjacent to the NRA that celebrate diversity, democracy and freedom. Interpretive and educational programming should recognize the vital contributions that people of color, women and Native Americans have made to the region.
 5. Develop culturally- and language-appropriate facilities, signage, and programming.
 6. Comply with equal justice laws and principles for equal access to public resources, including the President's 1994 Order 12898 on Environmental Justice, Title VI of the Civil Rights Act of 1964 and its regulations
 7. Expand the NRA boundaries to include more of the San Gabriel and Rio Hondo River corridors, urban communities south of the San Gabriels and nearby cultural, art and heritage sites.
 8. Expand the NRA boundaries to ensure connectivity among urban areas along the San Gabriel and Rio Hondo Rivers, Puente-Chino Hills, and Chino Hills State Park.
 9. Fully fund the proposed NRA.

VII. Conclusion

We believe that Alternative D offers much value and is the optimal option presented in the study. At the same time, we believe that Alternative D can be made even stronger through the means described above.

Park and health disparities are vital concerns in the San Gabriel region that disproportionately impact people of color and low-income people. Creating a National Recreation Area has the potential to help correct these disparities and permit all people to enjoy the many benefits that green space provides while implementing the values and principles of the National Park Service.

Sincerely,

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Acjachemen Nation, Juaneño Tribe

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