



**#OUR
PARKS**
Greater Los Angeles

July 14, 2017

Jane Beesley
Administrator
Los Angeles County Regional Park and Open Space District
510. S Vermont Ave., Room 230
Los Angeles, CA 90020

Re: Measure A Implementation Competitive Grant Program Guideline Development

Dear Administrator Beesley,

On behalf of the OurParks Coalition, we thank you for the opportunity to provide feedback and guidance on the development of the funding framework and grant guidelines for Measure A.

The Los Angeles Countywide Comprehensive Parks and Recreation Needs Assessment is a critical mechanism to the implementation of Measure A. The Needs Assessment established a framework and set of criteria for identifying park access and park quality gaps throughout the county. As such, OurParks strongly endorses the Needs Assessment as a foundation for efforts towards implementing Measure A.

We also recognize that more work is necessary by the Los Angeles County Regional Park and Open Space District (RPOSD) team and the Measure A Implementation Steering Committee to determine how programmatic-focused funds will be distributed to programs and projects in a manner that ties back into the Needs Assessment by increasing access and serving communities in high and very high need study areas.

Above all, funding must be equity focused and integrate multi-benefit approaches to project design and implementation. We encourage RPOSD to develop a clear framework and granting process that is based on equitable access to high-quality parks and open spaces and that embrace innovation in community engagement, transparency, and ongoing evaluation.

The following recommendations provide specific priorities that we believe are critical to achieving a successful equity-based funding program.

1. Equity

The goal of Measure A is to provide an equitable distribution of resources to meet the needs of Los Angeles County residents through parks and open space projects. The OurParks Coalition defines park equity as all residents of Los Angeles County, regardless of zip code, age, race, or income level, having access to a safe and well-maintained park, playground, garden, or open space within a 10-minute walk from where they live. With this in mind, we recommend the following:

- **Equity-based criteria** need to be developed that allow for the prioritization of funding and planning efforts. In developing such criteria, we encourage RPOSD to clearly define the characteristics of the very high, high, and low need communities outlined in the Needs Assessment, to assist in equitable prioritization and allocation. These criteria should be demonstrated using both data-driven and narrative formats in the application and should weigh the potential to improve social equity and close racial disparities.

Criteria should include, but not be limited to:

- percentage of population that is low-income, non-white, and linguistically isolated;
- median household income;
- percentage of youth and senior citizens;
- additional issues faced by the community including historic and current environmental issues; rates of illness and health disparities; risk for exposure to toxic environments; and the impacts of climate change, specifically extreme heat and flooding.

We also ask that RPOSD consider factors in developing the grant guidelines that help identify who directly benefits from the project and any unanticipated burdens that may be placed upon communities that are being recommended for funding (e.g. displacement).

Some potential factors to consider include:

- numeric disparities based on race, color, national origin, income, and wealth of the community;
 - statistical studies and anecdotal evidence related to need in the community;
 - support of partnerships with organizations that include race and social justice as fundamental to their operations and business practices; and
 - actively involving park-poor, low-income, and communities of color in every step of the development of the guidelines.
- **Environmental justice and health disparities.** Communities that historically and currently face environmental injustices and that are over-burdened by negative health impacts should be prioritized for Measure A funding. Parks and/or proposed park projects that are located in very high or high need communities that also exhibit more than one of the following factors should receive prioritization:

- high rates of crime and low factors of safety as identified and discussed by community members and documented by local crime statistics;
 - overall health of the community as compared to the county-wide average;
 - other physical and environmental health issues that are reported by the community or local agencies;
 - communities that are most at risk to the impacts of climate change with a focus on extreme heat and flooding.
- **Expanded access.** Funding should prioritize communities that have the least amount of *accessible and usable* park and open space acreage. Many factors determine accessibility and usability including: necessary travel time, distance and need for vehicular transportation; physical obstacles such as freeways; the perceived safety of the space; hours of operation and associated costs of entry; recreational amenities available in the space; and the physical appearance and condition of the space. These factors and realities need to be taken into account when determining criteria to ensure equitable park access.

Regional open space acquisition applications should require an access plan that demonstrates who is being served by the project and how access is being provided.

- **Non-traditional recreational spaces.** Many currently park-poor neighborhoods in Los Angeles County are also very dense, with limited available land to develop into park space. In these communities we encourage RPOSD to consider innovative models and projects that increase access to nature and open space through creative solutions including:
 - utilizing publicly owned rights-of-way and vacant spaces such as transmission corridors, alleys, and school yards;
 - expanding the urban forest and integrating public gardens and other natural elements into park-poor communities;
 - provide transit to parks and regional open spaces outside of a direct neighborhood; and
 - provide funding for programs that serve communities from park-poor neighborhoods even if the program itself is not physically located within a park-poor neighborhood.

2. Multi-benefit projects

Every opportunity should be considered when designing new parks or retrofitting existing parks to examine how they can best serve the multiple needs of the region and the communities that depend on them.

Within the grant application, multi-benefit project strategies should be described in narrative format, while remaining data-driven. Additionally, we recommend that RPOSD research best practices in both using data-based tools to support grant application development, as well as

integrating data-driven decision making in the grant selection process. This could include developing a tool based on the Needs Assessment or directing users to existing tools such as the California State Parks Community Fact Finder, CalEnviroScreen, or The Trust for Public Land's Climate Smart Cities Decision Support Tool to supplement Needs Assessment data.

More specifically, in developing criteria for expenditures, RPOSD should prioritize projects that:

- **Integrate multiple objectives**, including: water conservation and supply; water and air quality improvements; flood risk management; greenhouse gas (GHG) reduction; carbon sequestration; heat-island reduction; habitat protection and biodiversity; alternative transportation; urban agriculture; and public health and environmental protection and justice.
- **Leverage opportunities identified in integrated regional planning efforts** (such as the Los Angeles County Climate Action Plan, Watershed Management Plans, the County's Los Angeles Basin Stormwater Conservation Study, and the Los Angeles Department of Water and Power Stormwater Capture Master Plan). No project should be evaluated and designed in a vacuum, but rather planned as part of a comprehensive, data-driven strategy in partnership with regional planners, municipalities, agencies, and local stakeholders.
- **Apply design principles that prioritize sustainability and ease of maintenance.** Plants should be climate-appropriate and have "Low" to "Very Low" water needs, or be a part of the native plant community. They must not be listed in the Cal-IPC Invasive Plants database. The design should conserve the natural features of the site to the greatest extent possible and provide for the continued ecological health of the area, including a preference for native plant material and enhancement of soil health.
- **Utilize carbon negative materials and construction practices.** Project planners should minimize the cost of construction, installation, and operation and maintenance by using: gravity flow rather than pumped flow; living filtration over synthetic/mechanical filtration; and living surface infiltration instead of piped drainage. Where possible, projects should avoid the use of carbon intensive Portland cement and utilize low-albedo materials for any hardscapes. Priority should be given to pervious surfaces over impervious surfaces. Parking areas should include adequate tree canopy using appropriate native tree species, and should be designed to manage a 5-year storm without creating off-site nuisance flow.
- **Mimic natural processes.** Planners should include sufficient spaces for healthy, living soils and native vegetation to sequester carbon, reduce runoff water volume and pollutant load, provide shading and cooling, and enhance wildlife habitat and sense of place. Where feasible, projects should direct off-site runoff into the park space, employ visible grading and contour practices that maximize stormwater capture and infiltration,

and daylight channelized subsurface flows. Native landscapes that have local sources of water enhance natural habitat and reduce the need for imported water and costly drainage conveyance infrastructure.

- **Support local water supply strategies that measurably reduce GHG emissions, climate change impacts, and reliance on water imports.** Parks and open spaces should be considered as green infrastructure. Projects should incorporate stormwater management to reduce energy intensive water imports for irrigation through rainwater harvesting, groundwater recharge, and efficient irrigation practices. These methods are cost-effective, resilient to changes in climate, and benefit local communities and ecosystems.
 - **Outdoor water.** Parks should use stormwater and other non-potable sources as primary irrigation sources. They should feature water-efficient landscape and irrigation strategies, including water harvesting, reuse and recycling, to reduce outdoor potable water consumption by a minimum of 50 percent over that consumed by conventional practices. Planners should employ design and construction strategies that reduce stormwater and polluted site water runoff.
 - **Indoor water.** Parks should incorporate strategies that in aggregate reduce potable water use by a minimum of 20 percent below the indoor water use baseline calculated for the building, after meeting the Energy Policy Act of 1992 fixture performance requirements.
 - **Potable water.** Drinking water needs to be available in Los Angeles County parks near restrooms, libraries, most information booths, and on trail heads when water access is available. Existing fountains need to be assessed and tested for lead in pipes and replaced when water flow is compromised. New bottle refill stations need to be installed where locations have high pedestrian use. Tap water education should be supported through interpretive signage where possible.
- **Maximize educational interpretive opportunities.** The benefits of green infrastructure practices are ecological, economic, and social. Park and open space projects should actively engage users with strategies and best practices being deployed through the use of interpretive features and programming so that they may see, understand, appreciate, and replicate the many benefits being provided.
- **Integrate urban nature.** This includes projects that protect existing natural areas or areas that have significant habitat value, or projects that are helping to remove invasive weeds and restore a site with plants that have value to pollinators or food for wildlife. Native or habitat-friendly plants that support overall ecosystem function and that help to provide habitat value such as shade, food, and hiding spaces should be prioritized.
- **Employ a comprehensive approach.** A park's composition should be comprehensive and promote many healthful benefits so as to ensure that these many benefits extend

beyond its boundaries to the surrounding community. When possible, public grounds should be connected by greenways, including alternative transportation ways and boulevards so as to extend and maximize park spaces, and improve the integrity and resiliency of ecological corridors.

3. Community investment

We believe strongly that Measure A funds should strive to benefit the existing community, through investments and protections where possible. To this end we recommend the following:

- **Local hiring.** Where possible and feasible, funding programs should include a requirement that grantees identify and clearly articulate how they will include local hiring and/or youth training for project implementation. This could include partnering with the local conservation corps. Applicants should include a letter demonstrating their intent to partner with the conservation corps or other specific details on how they will work with the community to integrate local hire requirements into their construction process.
- **Anti-displacement.** Grant programs like the Transformative Climate Communities program require anti-displacement planning as part of the funding application. We recognize that this may not be feasible for smaller grant amounts. We recommend that RPOSD consider a funding threshold at which a formal community displacement planning effort is required.

4. Community engagement

Planning for a project should include deep community engagement that encourages marginalized populations to participate in the funding process as active decision makers in their communities. Applicants should be required to describe in detail their approach to community engagement and the ways the project addresses community priorities. Outreach should be tailored to the needs of individual communities, consist of a range of different techniques, and be conducted in locations and at times that are convenient for community residents. Translation, childcare, and food should be provided where appropriate. If necessary, workshops or technical assistance for community outreach should be provided to ensure that applicants have the tools to develop and implement a robust engagement plan.

Additionally, we encourage RPOSD to support the development of innovative partnerships through the distribution of grant funding. By thinking outside the box, grant programs can ensure community needs are met by involving organizations that truly represent the communities receiving funding.

5. Program evaluation

The Needs Assessment was an important tool to help determine the areas of greatest park need in the county, however there is still more work to be done around developing further and deeper community planning initiatives. We recommend that RPOSD create a **Technical Advisory Committee (TAC)** to be facilitated by RPOSD and including diverse representation of park and open space stakeholders throughout the county. The TAC will:

- provide technical assistance support;

- help to monitor the success of the grant program through setting numeric equity-based goals for local parks, beaches, open space, and water resources, as well as for efficiency, conservation, and sustainability of the grant program;
- course correct if needed to ensure funding is reaching and having an impact in high-need communities;
- identify and provide support for issues associated with displacement, ensuring they are being addressed up-front and throughout the entire project implementation process;
- ensure accountability and transparency of Measure A funding; and
- provide input during updates of the Needs Assessment.

Moreover, we recommend that RPOSD includes on the TAC a diverse set of stakeholders with expertise in:

- housing and urban development,
- environmental justice,
- economic development,
- anti-displacement policy,
- conservation,
- ecology and biology,
- botany,
- climate science, and
- community engagement.

Once the TAC has established equity-based numeric goals for local parks, beaches, open space, and water resources, we recommend that RPOSD create a **report card** to clearly communicate to the public how Measure A funds are being spent. The report card should include equitable development monitoring to report on community wellbeing and displacement risk, as well as track progress in community investments.

The report card should be based on annual evaluation and be used as an adaptive management tool to adjust the competitive programs, ensuring goals are being met across the region. Evaluation is an opportunity to do the following:

- reassess project selection criteria, taking into account how impactful the funding is being;
- ensure a balance of types of services by service area;
- analyze distribution of funding; and
- allow opportunities for applicants to provide feedback.

Finally, we would like to reinforce the need for RPOSD to comply with state and federal laws on equal access to publicly funded resources, including parks and recreation programs, and the need for RPOSD to ensure recipients of Measure A funding comply with these laws when relevant and applicable to parks. Our nation was founded on the ideal that all of us are entitled to life, liberty and the pursuit of happiness. Fortunately, we know what works to keep all communities healthy and green and to ensure equal access to parks and recreation. This is how people achieved the community victories to create and protect the Kenneth Hahn Recreation

Center in the Baldwin Hills, Los Angeles State Historic Park, Río de Los Angeles State Park, and Los Angeles River revitalization. These laws include, for example, California Government Code 11135 and its regulations, Title VI of the Civil Rights Act of 1964 and its regulations, the National Environmental Policy Act, the Fair Housing Act, the President's Executive Order 12898 on environmental justice and health, and others.

It is our hope that a focus on delivering projects does not come at the expense of ensuring those projects advance multi-benefit goals; the guidelines must include an emphasis on planning and project development. A significant amount of support for Measure A was premised on its progressive vision for parks and open space as critical green infrastructure and the need to close the gap for severely impacted communities with little or no access to parks or open space. We believe the suggestions provided will help ensure the promises of Measure A are fulfilled.

Thank you again for the opportunity to provide guidance on the implementation of Measure A. We look forward to working with the RPOSD team to ensure Measure A funding is distributed in a way that considers equity, justice, and environmental benefit.

Sincerely,

The #OurParks Coalition Core Team

#OurParks is convened by Audubon at Debs Park, Bruce Saito, The City Project, Community Nature Connection, Friends of the Los Angeles River, From Lot to Spot, Heal the Bay, Los Angeles Conservation Corps, Los Angeles Neighborhood Land Trust, The Nature Conservancy, San Gabriel Mountains Forever, TreePeople, The Trust for Public Land, and The Wilderness Society.

We also recognize that in addition to the high and very high need communities identified in the Needs Assessment, more work is necessary by the LA County Regional Park and Open Space District (RPOSD) team and the Measure A Implementation Steering Committee to determine how programmatic focused funds will be distributed to programs such as open space access, transportation to open space and job training in a manner that increases access and serves communities in high and very high need study areas.

Jane Beesley
Administrator
LA County Regional Park and Open Space District
510. S Vermont Ave., Room 230
Los Angeles, CA 90020

Re: Measure A Implementation Competitive Grant Program Guideline Development

Dear Administrator Beesley,

On behalf of the OurParks Coalition we thank you for the opportunity to provide feedback and guidance on the development of the funding framework for Measure A.

We recognize that the LA County Park Needs Assessment is a solid start at identifying and prioritizing park need in LA County. However, we believe there is still more work to do in developing a framework for Measure A funding that helps to ensure all communities in LA County have access to high-quality and sustainably-designed parks, open spaces, and amenities. Specifically, **funding must be equity focused and integrate multi-benefit approaches to project design and implementation.** We encourage the LA County Regional Park and Open Space District (RPOSD) to develop a clear framework and granting process that is based on equitable access to high-quality parks and open spaces and that embraces innovation in community engagement, experimentation, transparency, and ongoing evaluation.

The following recommendations provide specific priorities that we believe are critical to achieving a successful equity-based funding program.

1. Equity

The goal of Measure A is to provide an equitable distribution of resources to meet the needs of LA County residents through parks and open space resources. With this at the forefront of our minds, we suggest the following recommendations to RPOSD:

- **Equity-based criteria** need to be developed that allow for the prioritization of funding and planning efforts. In developing such criteria, we encourage RPOSD to clearly define the characteristics of the very high, high, and low need communities outlined in the Needs Assessment, to assist in equitable prioritization and allocation. These criteria should be data driven as well as weigh the potential to improve social equity and close racial disparities. They should include, but not be limited to:
 - percentage of population that is low-income, non-white, and linguistically isolated;
 - median household income;
 - percentage of youth and senior citizens;
 - degree of need (which can be identified based on historic and current environmental issues that may include: a history of social and environmental justice issues; rates of illness and health disparities; risk for exposure to toxic environments; and the impacts of climate change, specifically extreme heat and flooding); and
 - other factors such as the risk of displacement due to increased land values from local investment of grant dollars, development of a park, or acquisition of a new open space.

Additionally, we suggest that RPOSD consider using language and a framework similar to the AB31 Grant Program. Key criteria from this program that should be included are:

- Does the community within proximity of the project site have less than 3 acres of usable open space per 1,000 residents?
- Is the median household income lower than \$47,331?
- How has the local community participated in the development of the project and priorities?
- How does the project integrate real multi-benefit elements?

We also ask that RPOSD consider factors in developing the grant guidelines that help identify who directly benefits from the project and any unanticipated burdens that may be placed upon communities that are being recommended for funding (e.g. displacement).

Some potential factors to consider include:

- numeric disparities based on race, color, national origin, income, and wealth of the community;
- statistical studies and anecdotal evidence related to need in the community;
- Supporting partnerships with organizations that include race and social justice as fundamental to their operations and business practices; and
- including park-poor, low-income, and communities of color in every step of the development of the guidelines.

- **Environmental justice and health disparities.** Communities that historically and currently face have historically faced environmental injustices and that are over-burdened by negative health impactsdisparities should be prioritized for Measure A funding. Parks and/or proposed park projects that are located in very high or high need communities that also exhibit more than one of the following factors should receive prioritization:
 - high rates of crime and low factors of safety as identified and discussed by community members and documented by local crime statistics;
 - overall health of the community as compared to the county-wide average;
 - other physical and environmental health issues that are reported by the community or local agencies;
 - communities that are most at risk for extreme heat and flooding as a result of climate change.

- **Expanded access.** Funding should prioritize communities that have the least amount of *accessible and usable* park and open space acreage. Many factors determine accessibility and usability including: necessary travel including time, distance, and need for vehicular transportation; physical obstacles such as freeways; the perceived safety of the space; hours of operation and associated costs of entry; recreational amenities available in the space; and the physical appearance and condition of the space. These factors and realities need to be taken into account when determining prioritization criteria to ensure equitable park access.

- **Non-traditional recreational spaces.** Many currently park-poor neighborhoods in LA County are also very dense, with limited available land to develop into park space. In these communities we encourage RPOSD to consider innovative models and projects that increase access to nature and open space through creative solutions including:
 - utilizing publicly owned rights-of-way and vacant spaces such as transmission corridors, alleys, and school yards;
 - expanding the urban forest and integrating publiccommunity gardens and other natural elements into park-poor communities;
 - provide transit to parks and regional open spaces outside of a direct neighborhood; and
 - provide funding for programs that serve communities from park-poor neighborhoods even if the program itself is not physically located within a park-poor neighborhood.

2. Multi-benefit Scoring Cr

Every opportunity should be considered when designing new parks, retrofitting existing parks or acquiring open space to examine how the projects can best serve the multiple needs of the region and the communities that depend on them. It is essential that RPOSD **prioritize projects**

in communities that are most at risk to the impacts of climate change with a focus on extreme heat and flooding.

More specifically, in developing criteria for expenditures, RPOSD should prioritize projects that:

- **Integrate multiple objectives**, including: water conservation and supply; water and air quality improvements; flood risk management; greenhouse gas (GHG) reduction; carbon sequestration; heat-island reduction; habitat protection and biodiversity; alternative transit; urban agriculture; and public health and environmental protection and justice.
- **Leverage opportunities identified in integrated regional planning efforts** (such as the Los Angeles County Climate Action Plan, Watershed Management Plans, the County's Los Angeles Basin Stormwater Conservation Study, and the LADWP Stormwater Capture Master Plan). No individual park project should be evaluated and designed in a vacuum, but rather planned as part of a comprehensive, data-driven strategy in partnership with regional planners, municipalities, agencies, and local stakeholders.
- **Apply design principles that prioritize sustainability and ease of maintenance.** Plants should be climate-appropriate and have "Low" or "Very Low" water needs. They must not be listed in the Cal-IPC Invasive Plants database. The design should conserve the natural features of the site to the greatest extent possible and provide for the continued ecological health of the area, including a preference for native plant material and enhancement of soil health.
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- **Mimic natural processes.** Planners should include sufficient spaces for healthy, living soils and native vegetation to sequester carbon, reduce runoff water volume and pollutant load, provide shade and cooling, and enhance wildlife habitat and sense of place. Where feasible, projects should direct off-site runoff into the park space, employ visible grading and contour practices that maximize stormwater capture and infiltration, and daylight channelized subsurface flows. Native landscapes that have local sources of water enhance natural habitat and reduce the need for imported water and costly drainage conveyance infrastructure.

- **Support local water supply strategies that measurably reduce GHG emissions, climate change impacts, and reliance on water imports.** Parks and open spaces should be considered as green infrastructure. Projects should incorporate stormwater management to reduce energy intensive water imports for irrigation through rainwater harvesting, groundwater recharge, and efficient irrigation practices. These methods are cost-effective, resilient to changes in climate, and benefit local communities and ecosystems.
 - **Outdoor water.** Parks should use stormwater and other non-potable sources as primary irrigation sources. They should feature water-efficient landscape and irrigation strategies, including water harvesting, reuse and recycling, to reduce outdoor potable water consumption by a minimum of 50 percent over that consumed by conventional practices. Planners should employ design and construction strategies that reduce stormwater and polluted site water runoff.
 - **Indoor water.** Parks should incorporate strategies that in aggregate reduce potable water use by at minimum 20 percent below the indoor water use baseline calculated for the building, after meeting the Energy Policy Act of 1992 fixture performance requirements.
 - **Potable water.** Drinking water needs to be available in LA County parks near restrooms, libraries, most information booths, and on trail heads when water access is available. Existing fountains need to be assessed and tested for lead in pipes and replaced when water flow is compromised. New bottle refill stations need to be installed where locations have high pedestrian use. Tap water education should be supported through interpretive signage where possible.

- **Maximize educational interpretive opportunities.** The benefits of green infrastructure practices are ecological, economic, and social. Actively engage park users with strategies and best practices being deployed in their parks through interpretive features and programming so that they may see, understand, appreciate, and replicate the many benefits being provided.

- **Integrate urban nature.** This includes projects that protect existing natural areas or areas that have significant habitat value, or projects that are helping to remove invasive weeds and restore a site with plants that have value to pollinators or food for wildlife. Native or habitat-friendly plants that support overall ecosystem function and that help to provide habitat value such as shade, food, and hiding spaces should be prioritized.

- **Employ a comprehensive approach.** A park's composition should be comprehensive and promote many healthful benefits so as to ensure that these many benefits extend beyond its boundaries to the surrounding community. When possible, public grounds should be connected by greenways, including alternative transit ways and boulevards so as to extend and maximize park spaces, and improve the integrity and resilience of ecological corridors.

3. Community investment

We believe strongly that Measure A funds should strive to benefit the existing community, through investments and protections where possible. To this end we recommend the following:

- **Local hiring.** Where possible and feasible, funding programs should include a requirement that grantees identify and clearly articulate how they will include local hiring and/or youth training for project implementation. This could include partnering with the local conservation corps. Applicants should include a letter demonstrating their intent to partner with the conservation corps or other specific details on how they will work with the community to integrate local hire requirements into their construction process.
- **Anti-displacement.** Grant programs like the Transformative Climate Communities program require anti-displacement planning as part of the funding application. We recognize that this may not be feasible for smaller grant amounts. We recommend that RPOSD consider a funding threshold at which a formal community displacement planning effort is required.

4. Community engagement

Planning for a project should include deep community engagement that encourages traditionally marginalized populations to participate in the funding process as active decision makers in their communities. Applicants should be required to describe in detail their approach to community engagement and the ways the project addresses community priorities. Outreach should be tailored to the needs of individual communities, consist of a range of different techniques, and be conducted in locations and at times that are convenient for community residents. Translation, childcare, and food should be provided where appropriate. If necessary, workshops or technical assistance for community outreach should be provided to ensure that applicants have the tools to develop and implement a robust engagement plan.

Additionally, we encourage RPOSD to support the development of innovative partnerships through the distribution of grant funding. By thinking outside the box, grant programs can ensure community needs are met by involving organizations that truly represent the communities receiving funding.

5. Program evaluation

The Needs Assessment was an important tool to help determine the areas of greatest park need in the county, however there is still more work to be done around developing further and deeper community planning initiatives. We recommend that RPOSD create a **Technical Advisory Committee (TAC)** to be facilitated by RPOSD and including diverse representation of park and open space stakeholders throughout the county. The TAC will:

- provide technical assistance support;
- help to monitor the success of the grant program through setting numeric equity-based goals for local parks, beaches, open space, and water resources, as well as for efficiency, conservation, and sustainability of the grant program;
- course correct if needed to ensure funding is reaching and having an impact in high-need communities;

- identify and provide support for issues associated with displacement, ensuring they are being addressed up-front and through the entire project implementation process;
- ensure accountability and transparency of Measure A funding; and
- provide input during updates of the Needs Assessment.

Moreover, we recommend that RPOSD includes on the TAC a diverse set of stakeholders with expertise in:

- housing and urban development,
- environmental justice,
- economic development,
- anti-displacement policy,
- conservation,
- ecology and biology,
- botany,
- climate science, and
- community engagement.

Once the TAC has established equity-based numeric goals for local parks, beaches, open space, and water resources, we recommend that RPOSD create a **report card** to clearly communicate to the public how Measure A funds are being spent. The report card should include equitable development monitoring to report on community wellbeing and displacement risk, as well as track progress in community investments.

The report card should be based on annual evaluation and be used as an adaptive management tool to adjust the competitive programs, ensuring goals are being met across the region. Evaluation is an opportunity to do the following:

- reassess project selection criteria, taking into account how impactful the funding is;
- ensure a balance of types of services by service area;
- analyze distribution of funding; and
- provide opportunities for applicants to provide feedback.

It is our hope that the focus on delivering projects does not come at the expense of ensuring those projects advance multi-benefit goals - the guidelines must include an emphasis on planning and project development. A significant amount of support for Measure A was premised on its progressive vision for parks and open space as critical green infrastructure and the need to close the gap for severely impacted communities with little or no access to parks or open space. We believe the suggestions provided will help ensure the promises of Measure A are fulfilled.

Thank you again for the opportunity to provide guidance on the implementation of Measure A. We look forward to working with the RPOSD team to ensure Measure A funding is distributed in a way that considers equity, justice, and environmental benefit.

Sincerely,

#OurParks Coalition

OurParks logo here

June 29, 2017

Jane Beesley
Administrator
LA County Regional Park and Open Space District
510. S Vermont Ave., Room 230
Los Angeles, CA 90020

Re: Measure A Implementation Competitive Grant Program Guideline Development

Dear Administrator Beesley,

On behalf of the OurParks Coalition we thank you for the opportunity to provide feedback and guidance on the development of the funding framework for Measure A.

We recognize that the LA County Park Needs Assessment is a start at identifying and prioritizing park need in LA County. However, we believe there is still more work to do in developing a framework for Measure A funding that helps to ensure all communities in LA County have access to high quality and sustainably designed parks, open spaces, and amenities. Specifically, **funding must be equity focused and integrate multi-benefit approaches to project design and implementation.** In order to ensure that the intention of Measure A and the Needs Assessment are achieved, it is important to develop specific equity-driven criteria as well as project evaluation criteria that demonstrate community engagement and how the project meets multi-benefit design criteria. We encourage the LA County Regional Park and Open Space District (RPOSD) to develop a clear framework and granting process that is based on equitable access to high quality parks and open spaces and that embraces innovation in community engagement, experimentation, transparency, and ongoing evaluation.

The following ten recommendations provide specific priorities that we believe are critical to achieving a successful equity-based funding program.

1. Use equity criteria to prioritize funding and planning efforts (demographics)

The goal of Measure A is to provide an equitable distribution of resources to meet the needs of our County's parks and open spaces. As such, it will be important to develop criteria that allows for the prioritization of funding and planning efforts to equitably address the needs of our very high, high, and low need communities that were outlined in the County-wide Needs Assessment. In developing equity-based criteria, we encourage RPOSD to clearly define what the characteristics of a very high, high, or low needs community are. Knowing what characterizes these communities will allow for criteria-driven decisions when prioritizing the allocation of County resources.

In developing equity-based criteria for resource allocation, the criteria should be data driven as well as weigh the potential to improve social equity and close racial disparities.

Based on this recommendation, the critical selection criteria should include:

- the percentage of the population that is low-income, non-white, and linguistically isolated;
- the median household income;
- the percentage of youth and senior citizens;
- the degree of need (which can be identified based on historic and current environmental issues that may include: a history of social and environmental justice issues; rates of illness and health disparities; risk for exposure to toxic environments; and the impacts of climate change, specifically extreme heat and flooding);
- other factors such as the risk of displacement due to increased land values from local investment of grant dollars, development of a park, or acquisition of a new open space.

Additionally, we suggest that RPOSD consider using language and a framework similar to the AB31 Grant Program. The key criteria from the AB31 Program that RPOSD should include are:

- Does the community within proximity of the project site have less than 3 acres of usable open space per 1,000 residents;
- Is the median household income lower than \$47,331;
- How has the local community participated in the development of the project and priorities; and
- How does the project integrate real multi-benefit elements?

2. Environmental justice and overall health disparities

Communities that have historically faced environmental injustices and are over burdened by health disparities such as those identified in very high and high needs communities should be prioritized for park funding.

Parks and/or proposed park projects that are located in very high or high needs communities that also exhibit more than one of the following factors should receive even stronger consideration in the selection criteria:

- high rates of crime and low factors of safety as identified and discussed by community members and documented by local crime statistics;
- overall health of the community as compared to the county-wide average;
- other physical and environmental health issues that are reported by the community or local agencies;
- communities that are most at risk for heat and flooding as a result of climate change.

3. Expand access - broadly define fundable park and open space projects

Many factors determine not only what can be utilized as a park or open space for active and passive recreation, but also what the degree of accessibility to these spaces is. In many

park-poor communities, spaces for recreation can be found in vacant lots, alley ways, and even underutilized roadways. Moreover, accessibility to these non-traditional parks and open spaces is determined by additional factors including: the time and distance between open space and the communities that (could) use them, whether green space can be reached without a car, physical obstacles such as highways, the perceived safety of the space, hours of operation and associated costs of entry, and the physical appearance, condition, and recreational amenities available in the space.

Funding should prioritize communities that have the least amount of park and open space acreage, that have the greatest challenge of accessing a park or open space (i.e. no transit, physical barriers, or unsafe spaces), that have the lowest incomes, and that are most impacted by health disparities.

Where necessary, use innovative models and projects to ensure access which includes:

- funding projects that utilize publicly owned rights-of-way and vacant spaces like transmission corridors, alleys, and school yards;
- funding projects that expand the urban forest, integrate community gardens and other natural elements that increase access to urban nature;
- funding projects that provide transit to parks and regional open spaces;
- funding programs that serve traditionally underserved communities yet may not be considered park poor as long as there is documentation of the community being served.

4. Multi-benefit, biodiverse, and climate vulnerable

Every opportunity should be considered when designing new parks or retrofitting existing parks to examine how they can best serve the multiple needs of the region and the communities that depend on them. It is essential that RPOSD **prioritize communities that are most at risk to the impacts of climate change with a focus on extreme heat and flooding**. Tools such as CalEnviroScreen or The Trust for Public Land's Climate Smart Cities Decision Support tool can help prioritize the best locations for communities that are most at risk for extreme heat and flooding.

More specifically, in developing criteria for expenditures, RPOSD should prioritize projects that:

- **Integrate multiple objectives**, including: water conservation and supply; water and air quality improvements; flood risk management; greenhouse gas (GHG) reduction; carbon sequestration; heat-island reduction; habitat protection and biodiversity; alternative transit; urban agriculture; and public health and environmental protection and justice.
- **Leverage opportunities identified in integrated regional planning efforts** (such as the Los Angeles County Climate Action Plan, Watershed Management Plans, the County's Los Angeles Basin Stormwater Conservation Study, and the LADWP Stormwater Capture Master Plan). No individual park project should be evaluated and designed in a vacuum, but rather planned as part of a comprehensive, data-driven

strategy in partnership with regional planners, municipalities, agencies, and local stakeholders.

- **Apply design principles that prioritize sustainability and ease of maintenance.** Plants should be climate-appropriate and have “Low” or “Very Low” water needs. They must not be listed in the Cal-IPC Invasive Plants database. The design should conserve the natural features of the site to the greatest extent possible and provide for the continued ecological health of the area, including a preference for native plant material and enhancement of soil health.
- **Utilize carbon negative materials and construction practices.** Project planners should minimize the cost of construction, installation, operation and maintenance by using: gravity flow rather than pumped flow; living filtration over synthetic/mechanical filtration; and living surface infiltration instead of piped drainage. Avoid the use of carbon intensive Portland cement and utilize low-albedo materials for any hardscapes. Priority should be given to pervious surfaces over impervious surfaces. Parking areas should include adequate tree canopy using appropriate native tree species, and should be designed to manage a 5-year storm without creating off-site nuisance flow.
- **Mimic natural processes.** Planners should include sufficient spaces for healthy, living soils and native vegetation to sequester carbon, reduce runoff water volume and pollutant load, provide shade and cooling, and enhance wildlife habitat and sense of place. Where feasible, projects should direct off-site runoff into the park space, employ visible grading and contour practices that maximize stormwater capture and infiltration, and daylight channelized subsurface flows. Native landscapes that have local sources of water enhance natural habitat and reduce the need for imported water and costly drainage conveyance infrastructure.
- **Support local water supply strategies that measurably reduce GHG emissions, climate change impacts, and reliance on water imports.** Parks and open spaces should be considered as green infrastructure. Projects should incorporate stormwater management to reduce energy intensive water imports for irrigation through rainwater harvesting, groundwater recharge, and efficient irrigation practices. These methods are cost-effective, resilient to changes in climate, and benefit local communities and ecosystems.
 - **Outdoor water.** Parks should use stormwater and other non-potable sources as primary irrigation sources. They should feature water-efficient landscape and irrigation strategies, including water harvesting, reuse and recycling, to reduce outdoor potable water consumption by a minimum of 50 percent over that consumed by conventional practices. Planners should employ design and construction strategies that reduce stormwater and polluted site water runoff.
 - **Indoor water.** Parks should incorporate strategies that in aggregate reduce potable water use by at minimum 20 percent below the indoor water use baseline calculated for the building, after meeting the Energy Policy Act of 1992 fixture performance requirements.
 - **Potable water.** Drinking water needs to be available in LA County parks near restrooms, libraries, most information booths, and on trail heads when water

access is available. Existing fountains need to be assessed and tested for lead in pipes and replaced when water flow is compromised. New bottle refill stations need to be installed where locations have high pedestrian use. Tap water education should be supported through interpretive signage where possible.

- **Maximize educational interpretive opportunities.** The benefits of green infrastructure practices are ecological, economic, and social. Actively engage park users with strategies and best practices being deployed in their parks through interpretive features and programming so that they may see, understand, appreciate, and replicate the many benefits being provided.
- **Integrate urban nature.** This includes projects that protect existing natural areas or areas that have significant habitat value, or projects that are helping to remove invasive weeds and restore a site with plants that have value to pollinators or food for wildlife. Native or habitat-friendly plants that support overall ecosystem function and that help to provide habitat value such as shade, food, and hiding spaces should be prioritized.
- **Employ a comprehensive approach.** A park's composition should be comprehensive and promote many healthful benefits so as to ensure that these many benefits extend beyond its boundaries to the surrounding community. When possible, public grounds should be connected by greenways, including alternative transit ways and boulevards so as to extend and maximize park spaces, and improve the integrity and resilience of ecological corridors.

5. Encourage and support innovative partnerships

Develop partnerships with organizations that include race and social justice as fundamental to their operations and business practices. Additionally, RPOSD should consider working with private partners on innovative park projects.

- Maintenance – LAUSD
- Incentivize partnerships

6. Hire youth and adults from local communities

Where possible and feasible, funding programs should include requirements that grantees identify and clearly articulate how they will include local hiring and/or youth training for project implementation. This could include partnering with the local conservation corps. Applicants should include a letter demonstrating their intent to partner with the conservation corps or other specific details on how they will work with the community to integrate local hire requirements into their construction process.

7. Incorporate and require anti-displacement strategies

If policies are in place and there's a planning process that works and that communities are involved in

Addressing/discussing role of greenspace in displacement

Acknowledge and discuss

Funding threshold – that kicks in requirements around greater community displacement planning effort

Displacement language from TCC

Develop grant guidelines that:

1. analyze the benefits and burdens on all people
 - a. numeric disparities based on race, color, national origin, income, & wealth
 - b. statistical studies and anecdotal evidence
 - c. Who benefits? who gets left behind?
 - d. Define standards for progress, midcourse corrections, and accountability
2. include people of color and low-income people in every step

8. Require robust and authentic community engagement – community driven prioritization

Planning for a project should include deep community engagement, and traditionally marginalized populations should be encouraged to participate in the funding process as active decision makers in their communities. Applicants should describe in detail their approach to community engagement and the ways the project addresses community priorities. Outreach should be tailored to the needs of individual communities, consist of a range of different techniques, and be conducted in locations and at times that are convenient for community residents. Translation, childcare, and food should be provided where appropriate. If necessary, workshops or technical assistance for outreach should be provided to ensure that applicants have the tools to develop and implement a robust engagement plan.

9. Plan for ongoing and deep community-based planning and program evaluation

The Needs Assessment was an important tool to help determine the areas of greatest park need in the county, but there is still more work to be done around developing further and deeper community planning initiatives. We recommend that RPOSD create a Technical Advisory Committee (TAC) of RPOSD, County Office of Sustainability, Public Health, and NGO experts in order to set numeric equity-based goals for local parks, beaches, open space, and water resources as well as for efficiency, conservation, and sustainability to maximize the efficient use of parks, open space and natural resources. The TAC would also provide input during the updates of the needs assessment.

10. Transparency and direct communication for process and evaluation

Once the TAC has established equity-based numeric goals for local parks, beaches, open space, and water resources, RPOSD should create a report card to communicate clearly to the public how Measure A funds are being spent. The report card should include an equitable development monitoring program to report on community wellbeing and displacement risk as well as track progress in community investments.

The report card should be based on an annual evaluation and be used as an adaptive management tool to adjust the competitive programs, ensuring goals are being met across the region. Evaluation is an opportunity to do the following:

- Evaluation of criteria/metrics – how impactful are we being?
- Balance types of services by service area.

- Where is the funding going?
- Evaluate actual access – opportunities for applicants to provide feedback and demonstrate need
- Evaluate the quality of access – even if the maps show there's access i.e. cemetery

Additional recommendations focused on the administration of the program include:

Technical Advisory Committee

Develop an advisory committee that:

- Provides technical assistance support;
- helps to monitor the success of the program in reaching and providing opportunities;
- to course correct if needed to ensure the funding is reaching and having an impact on high need communities;
- Identifies and provides support for issues associated with displacement ensuring that they are being addressed up-front and through the entire project implementation process.

Moreover, we recommend that RPOSD includes a diverse set of stakeholders with expertise in:

- Housing and urban development,
- environmental justice,
- economic development,
- anti-displacement policy,
- conservation,
- ecology and biology,
- botany,
- climate science,
- and community engagement.

The technical advisory committee will provide citizen oversight and support that includes helping to evaluate the impact of the funding programs and providing technical support to community based organizations, cities and other applicants.

It is our hope that the focus on delivering projects does not come at the expense of ensuring those projects actually advance multi-benefit goals; the guidelines must include an emphasis on planning and project development. A significant amount of support for Measure A was premised on its progressive vision for parks and open space as critical green infrastructure and the need to close the gap for severely impacted communities with little or no access to parks or open space. We believe the suggestions provided will help ensure the promises of Measure A are fulfilled.

Thank you again for the opportunity to provide guidance on the implementation of Measure A. We look forward to working with the RPOSD team to ensure Measure A funding is distributed in a way that considers equity, justice, and environmental benefit.

Sincerely,

#OurParks Coalition

Other notes to make sure is integrated:

Local return criteria – 5 criteria

Toolbox for project proponent

- Sustainability
- Climate
- Heat island
- Need
- Elderly
- Planning department

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Who else is missing?

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- 1. Use equity criteria to prioritize funding and planning efforts**
- 2. Environmental justice and overall health disparities (should also drive how funds are distributed)**
- 3. Expand access and broadly define parks and open spaces**
- 4. Fund multi-benefit and biodiverse projects and focus on reaching the most climate vulnerable communities**
- 5. Require robust and authentic community engagement –with an emphasis on projects that integrate community driven project prioritization**
- 6. Encourage and support innovative partnerships**
- 7. Hire local communities and youth**
- 8. Incorporate and require anti-displacement strategies**

- 9. Plan for ongoing and deep community-based planning and program evaluation
- 10. Develop transparent and direct communication structures for both the granting process and grant program evaluation

OurParks logo here

June 29, 2017

Jane Beesley  
Administrator  
LA County Regional Park and Open Space District  
510. S Vermont Ave., Room 230  
Los Angeles, CA 90020

***Re: Measure A Implementation Competitive Grant Program Guideline Development***

Dear Administrator Beesley,

On behalf of the OurParks Coalition we thank you for the opportunity to provide feedback and guidance on the development of the funding framework for Measure A.

We recognize that the LA County Park Needs Assessment is a start at identifying and prioritizing park need in LA County. We believe there is still more work to do in developing a framework for Measure A funding that helps to ensure all communities in LA County have access to high quality and sustainably designed parks. In order to directly engage and build community leadership, identify priorities and help direct funding to communities with the most inequitable distribution of resources.

We also recognize that to move from planning to action is not a simple task to execute consistently in a sizable county like Los Angeles. We encourage the RPOSD and county partners to take the time to develop a clear framework that is based on equity and to embrace innovation, experimentation, learning, and ongoing improvement in the process.

We also believe that key to ensuring change is that traditionally marginalized populations should be empowered to participate in the funding process as active decision makers in their communities. **First and foremost funding must be equity focused and integrate multi-benefit approaches to project design and implementation.**

A key to this includes the following ten recommendations:

### **1. Use Equity Criteria to Prioritize Funding and Planning Efforts (demographics)**

The criteria should be data driven and heavily weigh the potential to improve race and social equity and close racial disparities.

Critical demographic selection criteria include:

- Percent of the population that is low-income, non-white, or linguistically isolation
- Median household income
- High numbers of youth and seniors
- Displacement Risk
- Degree of need indicated by historic and current environmental issues - including risk for exposure to the impacts of climate - specifically heat and flooding

We encourage the RPOSD to build off of the focus of the needs assessment to identify communities that have the highest need for parks and that been disproportionately impacted by historic racism and environmental justice issues. This includes communities that have lower levels of park acreage, lower incomes, greater health disparities and are most at risk to the impacts of climate change.

To ensure the Measure A funding gets to the communities most at need we present a list of criteria to integrate into the framework you are developing. Additionally, we suggest the RPOSD consider using language and a framework similar to the AB31 model that prioritizes a equitable access to parks and open space through the implementation of multi-benefit project types.

The key criteria from the AB31 program that should be used as a guide include:

- Does the community within proximity of the project site have less than 3 acres of usable open space per 1,000 residents
- Is the median household income lower than \$47,331
- How has the local community participated in the development of the project and priorities
- And, how does the project integrate real multi-benefit elements.

More specific criteria that should drive the development of the Measure A implementation competitive grant program development and other programs funded by Measure A funds include the following:

### **2. Environmental Justice and Overall Health Disparities**

Funding for park sites with **historic environmental injustice issues** should be prioritized. Those parks in locations with more than one of these factors should receive even stronger consideration in the selection criteria.

This includes:

- Crime rates and identified safety issues in the community as identified and discussed by community members and documented by local crime statistics
- Overall health of the community as compared to the county-wide average
- Other environmental health issues that are reported by the community or local agencies
- Communities that are most at risk for heat and flooding as a result of climate change

### **3. Expand Access - Broadly define parks and open spaces**

Funding should prioritize communities that have the least amount of access to parks, have the lowest incomes and and that are most impacted by health disparities. Where necessary use innovative models and projects to ensure access. This includes providing transit to parks and regional open spaces. And funding projects that include using publicly owned rights-of-way and underutilized spaces like transmission corridors, alleys and school yards. Additional project considerations to ensure access include funding projects that integrate community gardens and natural elements that increase access to urban nature. and other projects like community gardens, school yards. Additionally, there are programs that serve traditionally underserved communities that are not located in a community that may be considered park poor. There should be criteria that allow for these programs to receive funds as long as they are able to document who they are serving.

**Many factors determine the accessibility of green space: Distance and time from green space to where people live, whether green space can be reached without a car, and obstacles such as highways.**

- **Location of natural geographic features and walkability**
- **Whether a park is safe, or perceived as safe, by local residents**
- **Physical appearance, condition and recreational amenities**
- **Whether green space is open to the public, hours of operation and cost of admission**

### **4. Multi-benefit and biodiverse and climate vulnerable**

Every opportunity should be considered when designing new parks or retrofitting existing parks to examine how they can best serve the multiple needs of the region and the communities that depend on them. **Prioritize communities that are most at risk to the impacts of climate change with a focus on heat and flooding.** Tools like CalEnviroScreen or The Trust for Public Land's Climate Smart Cities Decision Support tool can help to prioritize the best locations for communities that are most at risk for heat and flooding.

More specifically, in developing criteria for expenditures, RPOSD should prioritize projects that:

**Integrate multiple objectives**, including: water conservation and supply; water and air quality improvements; flood risk management; greenhouse gas (GHG) reduction; carbon sequestration; heat-island reduction; habitat protection and biodiversity; alternative transit; urban agriculture; public health and environmental protection and justice.

**Leverage opportunities identified in integrated regional planning efforts** (such as the Los Angeles County Climate Action Plan, Watershed Management Plans, the County's Los Angeles Basin Stormwater Conservation Study, and the LADWP Stormwater Capture Master Plan). No individual park project should be evaluated and designed in a vacuum, but rather planned as part of a comprehensive, data-driven strategy in partnership with regional planners, municipalities, agencies, and local stakeholders.

**Apply design principles that prioritize sustainability and ease of maintenance.** Plants should be climate-appropriate and have "Low" or "Very Low" water needs. They must not be listed in the Cal-IPC Invasive Plants database. The design should conserve the natural features of the site to the greatest extent possible and provide for the continued ecological health of the area, including a preference for native plant material and enhancement of soil health.

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**Support local water supply strategies that measurably reduce GHG emissions, climate change impacts, and reliance on water imports.** Parks and open spaces should be considered as green infrastructure. Projects should incorporate stormwater management to reduce energy intensive water imports for irrigation through rainwater harvesting, groundwater recharge, and efficient irrigation practices. These methods are cost-effective, resilient to changes in climate, and benefit local communities and ecosystems.

**Outdoor Water.** Parks should use stormwater and other non-potable sources as primary irrigation sources. They should feature water efficient landscape and irrigation strategies, including water harvesting, reuse and recycling, to reduce outdoor potable water consumption by a minimum of 50 percent over that consumed by conventional practices. Planners should employ design and construction strategies that reduce stormwater and polluted site water runoff.

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**Integrate urban nature.**

This includes projects that protect existing natural areas or areas that have significant habitat value. Or projects that are helping to remove invasive weeds and restore a site with plants that have value pollinators or food for wildlife. Finally native or habitat friendly plants that support overall ecosystem function and that help to provide habitat value such as shade, food and hiding spaces should be prioritized.

**Employ a comprehensive approach.** A park's composition should be comprehensive and promote many healthful benefits, so as to ensure that these many benefits extend beyond its boundaries to the surrounding community. When possible, public grounds should be connected by greenways, including alternative transit ways and boulevards so as to extend and maximize park spaces, and improve the integrity and resilience of ecological corridors.

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Develop partnerships with organizations that include race and social justice as fundamental to their operations and business practices.

- Maintenance – LAUSD
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## **7. Hire Local Communities and Youth**

Where possible and feasible funding programs should include requirements that grantees identify and clearly articulate how they will include a local hire or youth training for project implementation. This could include partnering with the local conservation corps. Applicants should include a letter demonstrating their intent to partner with the conservation corps or other specific details on how they will work with the community to integrate local hire requirements into their construction process.

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2. include people of color and low-income people in every step

## **9. Plan for Ongoing and Deep community-based Planning and Program Evaluation**

The needs assessment was an important tool to help determine the areas of greatest park need in the county and there is still more work to develop more and deeper deeper community planning initiatives. We recommend that the RPOSD create a Technical Advisory Committee of both RPOSD, County Office of Sustainability, Public Health and NGO experts in order to set numeric equity based goals for *local parks, beaches, open space, and water resources*. The TAC would also provide input during the updates of the needs assessment. And goals for efficiency, conservation, and sustainability programs to decrease utilization and maximize the efficient use of parks, open space and natural resources.

## 10. Transparency and Direct Communication for Process and Evaluation

That which gets measured gets done. Once the a TAC has is established equity based numeric goals for *local parks, beaches, open space, and water resources*, RPOSD should create.

Establish a report card to communicate clearly to the public how Measure A Funds are being spent. The report card should include *an equitable development monitoring program to report on community wellbeing and displacement risk as well as tracking progress in community investments*.

*The report card should be based on an annual evaluation and used as an adaptive management tool to adjust the competitive programs to ensure goals are being met across the region.*

Evaluation is an opportunity to do the following:

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**Additional recommendations focused on the administration of the program include:**

### **Technical Advisory Committee**

Develop an advisory committee and provide technical assistance support and helps to monitor the success of the program in reaching and provide opportunities to course correct if needed to ensure the funding is reaching and having an impact on high need communities and that issues associated with displacement are being addressed up-front and through the entire project implementation process.

Including a diverse set of stakeholders with expertise in the following areas: housing, environmental justice, economic development, anti-displacement policy, ecology and biology, botanist, climate and community engagement.

The technical advisory committee will provide citizen oversight and support that includes helping to evaluate the impact of the funding programs and providing technical support to community based organizations, cities and other applicants.

It is our hope that the focus on delivering projects doesn't come at the expense of quality control on whether those projects actually advance multi benefit goals. The guidelines must include an emphasis on planning and project development. A significant amount of support for Measure A was premised on its progressive vision for parks/open space to assume their role as important player in our county wide water infrastructure, while helping severely impacted communities

catch up in terms of park equity. Professional development of staff needs to be prioritized so that planning and development of multi benefit projects can achieve real established outcomes and prevents the notion that innovative project delivery really just means business as usual, only faster.

Thank you again for the opportunity to provide guidance on the implementation of Measure A. We look forward to working with the Open Space District team to ensure Measure A funding is distributed in a way that considers equity, justice and environmental benefit.

Sincerely,

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**Other notes to make sure is integrated:**

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Toolbox for project proponent

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