

LEAGUE of UNITED LATIN AMERICAN CITIZENS



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The City Project \* Concerned Citizens of South Central Los Angeles \* California LULAC  
Latino Coalition for a Healthy California \* Prevention Institute \* Sierra Club  
Marc Brenman, Social Justice Consultancy \* SPARC (Social and Public Art Resource Center)

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November 12, 2012

President Herb Wesson  
and the Honorable Members of the City Council  
City Attorney Carmen Trutanich  
200 N. Main Street  
Los Angeles, CA 90012

RE: **Equitable Park Funding (Motions 13-1100-S2 and 13-1100-S6)**

Dear President Wesson, Councilmembers Reyes, Krekorian, Zine, LaBonge, Koretz, Cardenas, Alarcon, Parks, Perry, Rosendahl, Englander, Garcetti, Huizar, and Buscaino, and Mr. Trutanich:

**The City Project and a diverse and growing alliance support funding for parks and park programs with an equity plan in place to ensure the benefits and burdens are distributed fairly for all, including park poor and income poor communities. We look forward to working with each of you, the city, and the people of Los Angeles to implement these goals.**

**Minority and low-income voters disproportionately support measures for park revenue and should receive their fair share of the benefits. We support a citizens' oversight committee and an equity plan to ensure that funding is equitably distributed. The equitable distribution of park resources is legally required.**

We applaud the City's efforts to address equitable park funding. *See* Memorandum from Miguel A. Santana, City Administrative Officer, and Gerry F. Miller, Chief Legislative Officer, City of Los Angeles, to the Council, City of Los Angeles (Nov. 8, 2012) ("November 8 Memo"). However, the City's analysis is inadequate, for the reasons discussed below.

**We ask you to ensure that an equitable park funding plan include the following elements:**

- (1) A clear description of what the city plans to do with proposed revenue.
- (2) An analysis of the *burdens* (taxes and costs) *and benefits* of parks and programs for all people.
- (3) An analysis of alternatives.
- (4) The full and fair inclusion of minority and low-income populations in the decision-making process.
- (5) An implementation plan to address any equity concerns identified in the analysis.<sup>1</sup>

<sup>1</sup> These elements are consistent with the equity plan that the Federal Transit Administration (FTA) has required as a condition of an agency receiving federal financial assistance under Title VI of the Civil Rights Act of 1964 and its regulations. *See* letters from FTA to MTC and BART dated Jan. 15, 2010, and Feb. 12, 2010, available at [www.cityprojectca.org/blog/archives/4468](http://www.cityprojectca.org/blog/archives/4468); Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000d to 2000d-4a; 45 C.F.R. Part 80; *Committee Concerning*

Equal Justice, Democracy, and Livability For All

Board: Chris Burrows Juan Devis Robert Garcia Tom Hayden

Robbie LaBelle Anne McEnany Lyndon Parker Michael Rodriguez

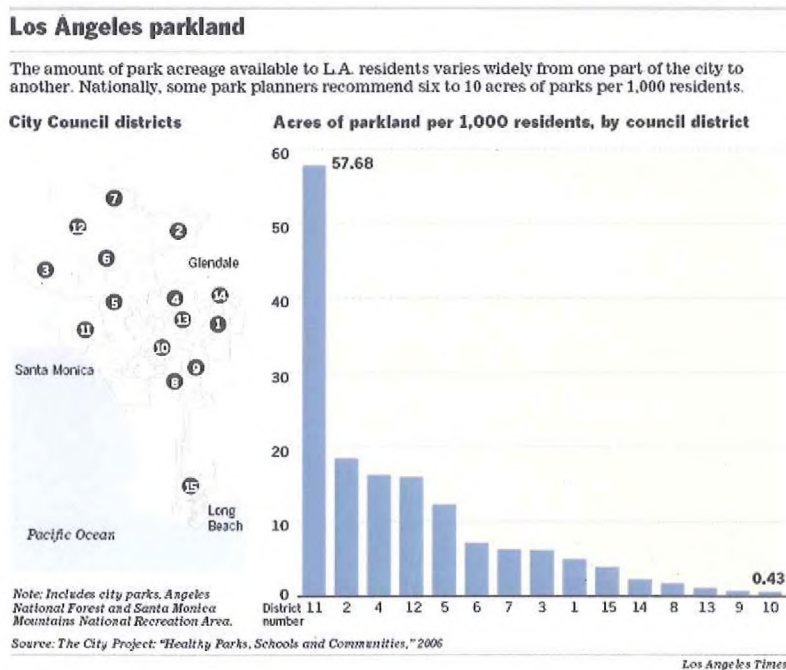
The City Project is a 501(c)(3) Non-Profit Organization and a Project of Community Partners



This equity plan is consistent with the action by the Department of Housing and Urban Development that led to the creation of the Los Angeles State Historic Park downtown. Then-Secretary Andrew Cuomo directed the city to consider the park alternative and the impact on people of color as a condition of receiving federal funding. This action led to the state buying the land to create what is now Los Angeles State Historic Park. Secretary Cuomo's letter is available at [www.cityprojectca.org/ourwork/urbanparks.html](http://www.cityprojectca.org/ourwork/urbanparks.html) - cornfield.

### **Parks and Park Programs in Los Angeles Are Inequitably Distributed**

Los Angeles has fewer acres of parks per thousand residents compared to other major cities. Park programs are disproportionately lacking in park-poor, income-poor, communities of color, and located in wealthier communities. An equity analysis will help ensure equal access to parks and park programs *for all*.



The November 8 Memo, using data from 2000, shows that the East, South L.A., and Central Community Plan Areas (except for Hollywood) have the worst access to parks. Those areas have below average park acreage per person and above average poverty compared to the city average. These areas are disproportionately populated by low income people and people of color.

The November 8 memo and statistics are consistent with the city's 2009 Community Needs Assessment (Needs Assessment). The Needs Assessment once again demonstrated that communities that are disproportionately low-income and of color have more unmet park and park program needs.

The Prioritized Needs Assessment (PNA) that is part of the Needs Assessment further prioritizes the needs of non-Hispanic white people over the needs of Latinos and other people of color. Non-Latino facility and recreation program needs are given a higher priority in the PNA than Latino needs. Of the ten

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*Community Improvement v. City of Modesto*, 583 F.3d 690 (9th Cir. 2009); *Larry P. v. Riles*, 793 F.2d 969 (9th Cir. 1986). See also Cal. Gov't Code § 11135; Cal. Code Regs. tit. 22 § 98101(i) (equal access to public resources by recipients of state funding). The City of Los Angeles signs agreements to comply with Title VI as a condition of receiving federal financial assistance, as discussed below.



highest priority facility needs ranked in the PNA for the city as a whole, eight of those facility types disproportionately serve the needs of non-Latinos more than Latinos. At the same time, five of the nine total facility types that disproportionately serve the needs of Latinos are ranked in the lowest priority category. In other words, 55% of the facilities that disproportionately serve the needs of Latinos are in the lowest priority category, while only 24% of the facilities that serve the needs of non-Latinos are in the lowest priority category.

Of the seven recreation program-types ranked as the highest priority needs in the PNA for the city as a whole, all seven programs disproportionately serve the needs of non-Latinos more than Latinos. Six of the seven program types identified as the highest priority serve the needs of non-Hispanic Whites more than other racial or ethnic groups. **The salient point is that the needs of non-Latinos and of non-Hispanic Whites are prioritized over the needs of all people of color, and the needs of non-Latinos are prioritized over the needs of Latinos.** Non-Latino needs are ranked as more important than Latino needs. The same is true when comparing the needs of non-Hispanic Whites to the needs of people of color. Each has unmet program needs, but the needs of the non-Hispanic Whites are prioritized over the needs of people of color within the PNA.

As City Controller, Laura Chick published audits of the City Recreation and Parks Department calling for a strategic plan to improve parks in every neighborhood, a fair system of finance and fees, standards to measure equity and progress, and reform of the distribution of Quimby park fees. The audits are available at [www.cityprojectca.org/blog/archives/255](http://www.cityprojectca.org/blog/archives/255). The city now has the opportunity to implement those recommendations to improve parks and recreation for all. See, for example, [www.cityprojectca.org/blog/archives/642](http://www.cityprojectca.org/blog/archives/642).

The City Project has documented extensively the park and health disparities in the City of Los Angeles in its Policy Reports. Maps and analyses showing park access and equity by city council district based on 2000 census data and council lines are attached. The City Project has also published *Healthy Parks, Schools and Communities: Green Access and Equity for the Los Angeles Region (2011)* and *Healthy Parks, Schools and Communities: Green Access and Equity for Southern California (2011)*. The reports are available at [www.cityprojectca.org/mapjustice](http://www.cityprojectca.org/mapjustice).

Prof. Jennifer Wolch and her colleagues have also mapped and analyzed green access and equity for the Los Angeles region in their Green Visions work with Active Living Research and reached similar conclusions. See [www.activelivingresearch.org/node/12099](http://www.activelivingresearch.org/node/12099).

The National Park Service recognizes the need to address park and health disparities in its strategic action plan for *Healthy Parks, Healthy People U.S. (2011)*. See [www.cityprojectca.org/blog/archives/12550](http://www.cityprojectca.org/blog/archives/12550).

The city should prioritize parks and park programs in underserved communities, and provide standards to measure progress and equity and hold officials accountable in the distribution of revenues, parks, and programs. Thus, for example, the state of California adopted standards to invest resource bond funds in *park poor* (less than three acres of parks per thousand residents) and *income poor* areas (below \$47,331 median annual household income). While the specific numbers may vary here, the city should follow this best practice example for quantifiable standards.

**The city now has the opportunity to prioritize funding for parks and park programs in the communities with the greatest needs to improve parks and programs for all.**

### **Equitable Distribution of Park Resources is Legally Required**

The City and RAP must comply with state and federal civil rights laws that prohibit both intentional discrimination, and discriminatory impacts regardless of intent, based on race, color or national origin by recipients of state and federal funds, including the City of Los Angeles. Title VI of the Civil Rights of 1964 and its implementing regulations prohibit both (1) intentional discrimination based on race, color or national origin, and (2) unjustified discriminatory impacts for which there are less discriminatory alternatives, by recipients of federal financial assistance. Intent to discriminate is not required under the regulations. The Fourteenth Amendment and section 1983 of the Civil Rights Act of 1871 prohibit intentional discrimination based on race, color or national origin.

The City of Los Angeles signs agreements to comply with Title VI and its regulations as a condition of receiving federal financial assistance. *See, e.g.*, FY09 Grant Assurances to California Emergency Management Agency, Laura Shin, Grants Director, City of Los Angeles (Sept. 21, 2009) (the city “[w]ill comply with all federal statues [sic] relating to Civil Rights and Nondiscrimination. These include but are not limited to: a. Title VI of the Civil Rights Act of 1964 (P.L. 88-352), as amended, which prohibits on the basis of race, color or national origin. . . . [and] i. Title 28, Code of Federal Regulations, Part 42, Subparts C [implementation of Title VI]”). Such compliance agreements cover all of the city’s programs including the Recreation and Parks Department. *See* Civil Rights Restoration Act of 1987, 20 U.S.C. 1681 *et seq.*; 68 Fed. Reg. 51334 (2003) (definition of “program or activity” or “program” subject to Title VI).

Further, California law prohibits both intentional discrimination and unjustified discriminatory impacts under Government Code section 11135 and its regulations, which are analogous to Title VI and its regulations. Cal. Gov. Code § 11135; 22 CCR § 98101(i) (2007).

California law also defines environmental justice as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.” Cal. Gov. Code § 65040.12.

The ballot resolution for a parcel tax measure, as currently drafted by the City Attorney, provides that an expenditure plan would be prepared annually in connection with the annual budget process. The Recreation and Parks Commission would develop a plan to allocate resources that would included equity factors, which “could include population, population density, availability of park facilities and services.” November 8 Memo at 2. “The expenditure plan would be subject to City Council approval, and would present an opportunity each year for the Council to ensure that equity and other disparity issues, as well as other demographic changes, are adequately addressed.” *Id.*

The November 8 Memo is a good start. We ask you to ensure that the equity plan addresses demographics, income, and poverty under the legal authorities and compliance agreements cited above.

### **City Councilmembers Support a Park Equity Plan**

During the October 31, 2012, city council meeting, Councilmember Jan Perry asked: “Now, on this question of parks, I just wanted a description, a specific description, a detail about what the city would do with the proposed revenue, is there an analysis of the burdens and the benefits, has there been a review of alternatives. And then in particular we talk about equity, I want to know what sort of language is proposed to deal with low-income areas in a participatory way. How do low-income areas participate in the decision-making process? And the last point is, what’s the implementation strategy to deal with equity concerns, social low-income equity concerns.”



Councilmember Bernard C. Parks asked: “Is it also a requirement of the parcel tax that the money can only be spent in the areas collected or is it a pot of money? . . . So you could solve maybe some of the equity issue as to more densely populated areas versus less densely populated but more parcels?”

Councilmembers Eric Garcetti, Ed Reyes, Jose Huizar, and Tom LaBonge, and now-Controller Wendy Greuel, have each emphasized the need to invest park funds in the most underserved communities during a council hearing on March 18, 2008. Videos of the hearing are available on the web. See [www.cityprojectca.org/blog/archives/643](http://www.cityprojectca.org/blog/archives/643).

For example, Councilmember Garcetti emphasized the need for parks to empower youth and provide positive alternatives to crime: “[W]hen we were able to do [a skate park], [the kids] designed it, they built it, they staff it now and I’ve got to tell you what it did to transform the Elysian Valley and to empower those kids in that neighborhood, keep them away from gangs, keep them out of trouble, and actually have a place to play. It is transformative.”

Councilmember Reyes emphasized that parks save children’s lives: “[W]e haven’t looked at the core issues of what causes gangs, and that is the ability for children to live near parks, to have diversion, so that they are not sucked into the gang culture.” “The end consequence is that the kids in our neighborhoods are being shot to death. Our kids don’t have a place to play. They don’t have baseball diamonds, they don’t have soccer fields. . . . We need to put our policy language in line with our realities. I hope this Council understands that it does take a brave act to do what’s right, and that we should sustain our policies so that we can allow for whole communities to live near parks.”

### **Diverse Voters Can Help Pass Properly Framed Funding Measures for Parks**

A recent poll of Latino voters documents that two-thirds of Latino voters identify as conservationists and overwhelmingly believe (90%) that we can “protect the environment and create jobs at the same time.” The statewide survey found Latino voters support “conservation” on a range of issues, and personally identify (66%) with conservation as a value. And these folks vote. The survey is available at [goo.gl/X6Pb3](http://goo.gl/X6Pb3).

California’s Latino and Asian voters are significantly more concerned about core environmental issues, including global warming, air pollution and contamination of soil and water, than non-Hispanic white voters, according to a Los Angeles Times/USC poll. For example, 50% of Latinos and 46% of Asians who responded to the poll said they personally worry a great deal about global warming, compared with 27% of whites. Two-thirds of Latinos and 51% of Asians polled said they worry a great deal about air pollution, compared with 31% of whites. See [www.cityprojectca.org/blog/archives/7358](http://www.cityprojectca.org/blog/archives/7358).

In 2006, California’s Proposition 84, a \$5.4 billion park and water bond, was successful because of massive support from the Latino community: 80% of Latino voters voted in favor of Prop 84, while only 48% of non-Latino voters supported the measure. The strong showing of support from the Latino community, with 616,000 more “yes” votes than “no” votes, was enough to push the overall balance in favor of Prop 84.

In 2002, California voters passed Proposition 40 to provide \$2.6 billion for parks, clean water and clean air. Prop 40 — the largest resource bond in United States history at the time— received the support of 77% of black voters, 74% of Latino voters, 60% of Asian voters, and 56% of non-Hispanic white voters. 75% of voters with an annual family income below \$20,000, and 61% with a high school diploma or less, supported Prop 40 — the highest among any income or education levels. Prop 40 demolished the myth that parks and a healthy environment is a luxury that communities of color and low-income communities cannot afford, or are not willing to pay for.



### **Voters Support Independent Citizens' Oversight**

Council President Wesson supported a citizens' oversight committee as part of the sales tax measure during the November 9, 2012, special meeting of the Rules Committee on these matters. We agree. Successful sales tax measures in the November 2012 election provided for a citizens' oversight committee.

Independent oversight can build voter confidence and ensures funds are spent equitably. We support independent oversight that includes:

1. A charter or memorandum of understanding defining the roles and responsibilities of the committee vis-à-vis city government, including the City Council and Recreation and Parks Commission and Department.
2. Logistical support from the council, including technical and administrative assistance and financial resources in furtherance of the committee's mission and purpose.
3. Members include representatives who are active in an environmental justice or civil rights organization, such as The City Project, to ensure equitable distribution of the benefits and burdens of the ballot measure.
4. Timely and complete access to information, including financial audits of revenue expenditures.

These elements are based on best practices used by the Independent Citizens' School Bond Oversight Committee of the Los Angeles Unified School District, which has helped raise and oversee \$27 billion for school construction and modernization, including joint use of schools, pools and parks.

### **Parks and Park Programs Matter**

The values at stake include the simple joys of playing in the park; physical, psychological and social health; improved academic performance; positive alternatives to gangs, crime, drugs, and violence; and economic vitality for all through local green jobs and increased property values. Parks offer conservation benefits through cleaner air and water, land conservation, and habitat protection. Parks play an important role in mitigating climate change and promoting climate justice. Parks promote spiritual, cultural, heritage, and public art values. Fundamental values of equal justice and democracy underlie each of these other values.

The Olmsted Report of 1930 proposed a vision for a green, prosperous, and culturally rich Los Angeles. Among other things, the Report recognized that low-income people often live in less desirable areas, have fewer leisure opportunities, and should receive first consideration in parks and recreation. The Report's recommendations remain valid today – but unfulfilled. It is time once again to develop a vision and plan for Los Angeles parks that will diversify public access to and support for parks and recreation while ensuring the fair treatment of people of all races, cultures, and incomes under federal and state civil rights, environmental, and other laws. See KCET Departures, *What Is Green Justice?* at [www.greenjustice.org](http://www.greenjustice.org).

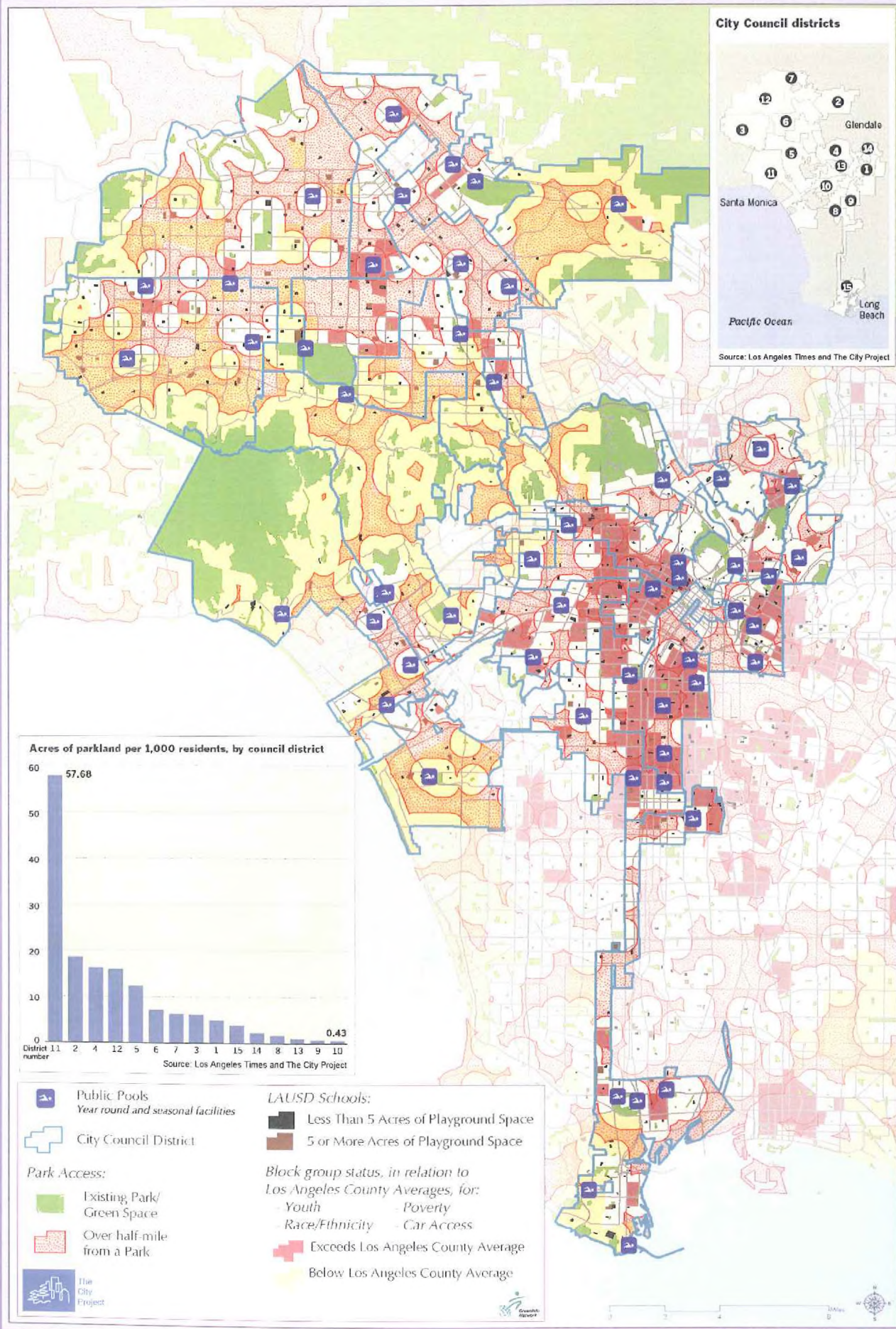
Very truly yours,

/s/  
Robert García  
Founding Director and Counsel

/s/  
Daphne Hsu  
Staff Attorney



# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

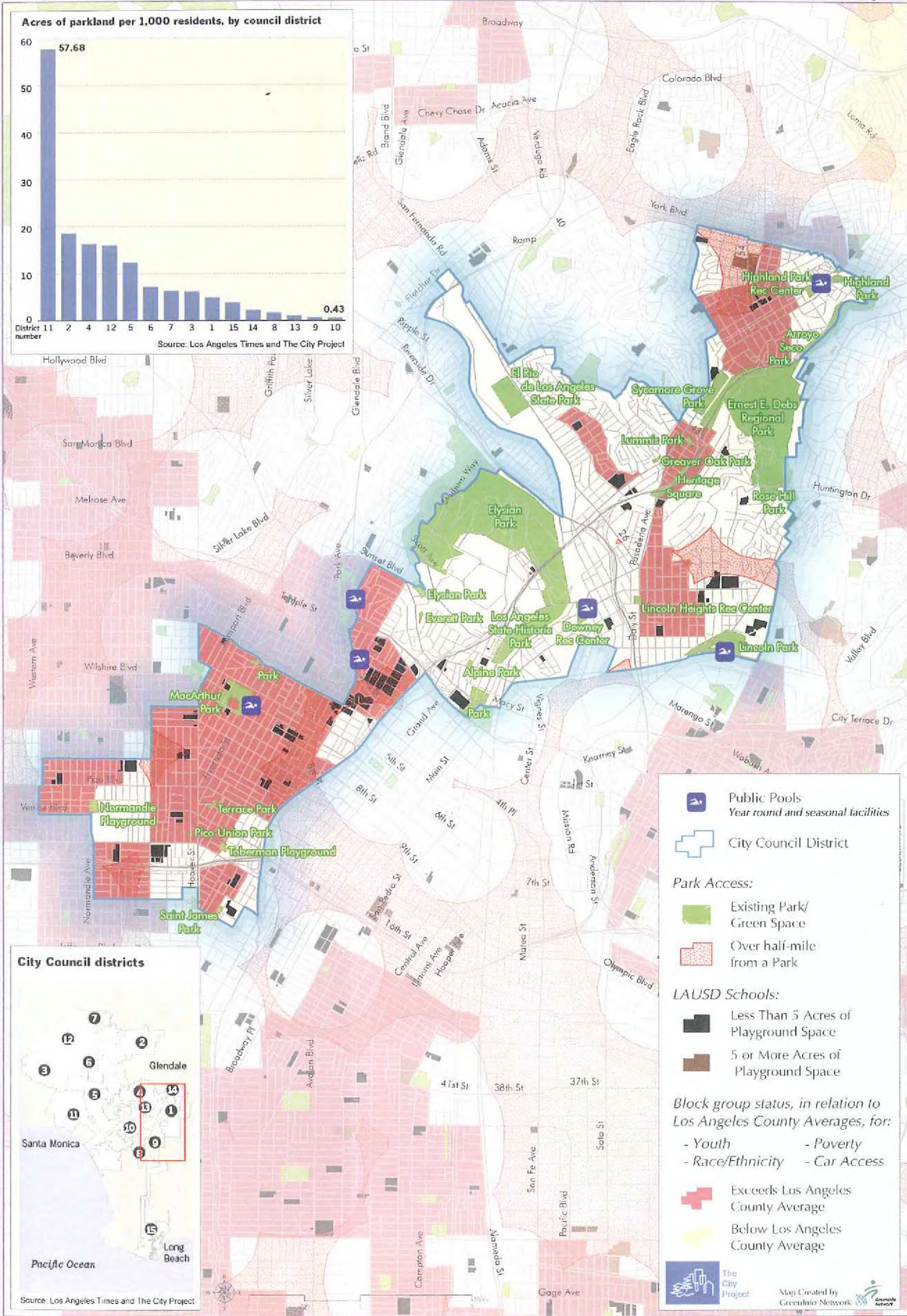
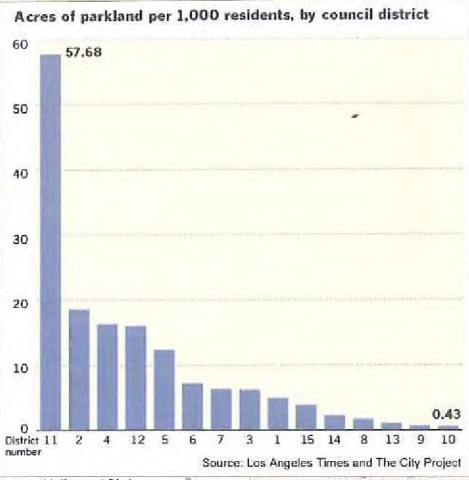




# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

City Council District #1

Ed P. Reyes



- Public Pools  
Year round and seasonal facilities
- City Council District
- Park Access:**
  - Existing Park/  
Green Space
  - Over half-mile  
from a Park
- LAUSD Schools:**
  - Less Than 5 Acres of  
Playground Space
  - 5 or More Acres of  
Playground Space
- Block group status, in relation to  
Los Angeles County Averages, for:**
  - Youth
  - Poverty
  - Race/Ethnicity
  - Car Access
- Exceeds Los Angeles  
County Average
- Below Los Angeles  
County Average

The City Project  
Map Created by  
GreenInfo Network

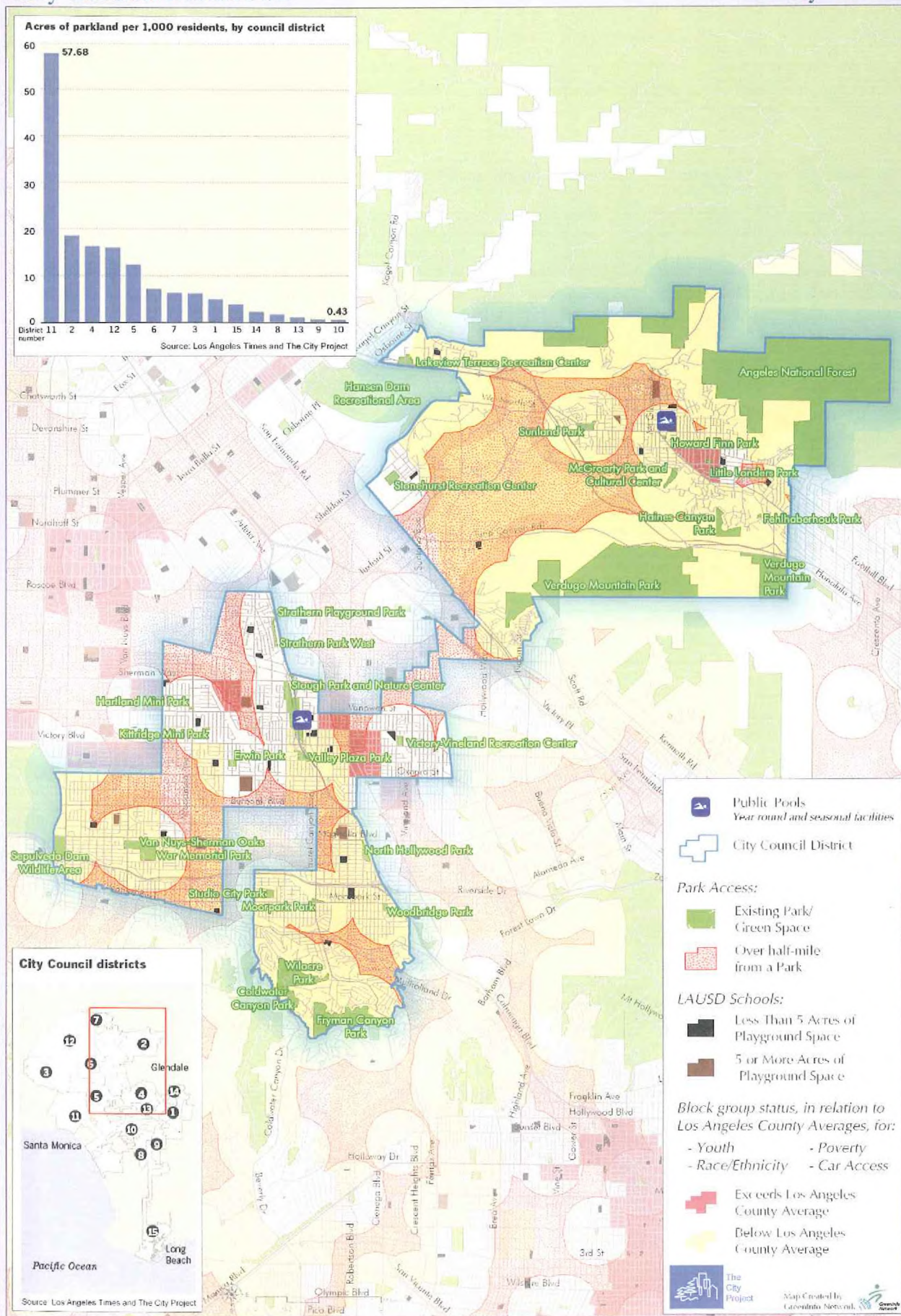
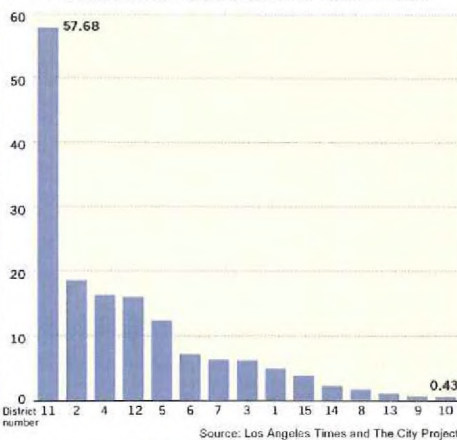


# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

City Council District #2

Wendy Greuel

Acre of parkland per 1,000 residents, by council district



- Public Pools  
Year round and seasonal facilities
- City Council District

**Park Access:**

- Existing Park/ Green Space
- Over half-mile from a Park

**LAUSD Schools:**

- Less Than 5 Acres of Playground Space
- 5 or More Acres of Playground Space

**Block group status, in relation to Los Angeles County Averages, for:**

- Youth
- Poverty
- Race/Ethnicity
- Car Access

- Exceeds Los Angeles County Average
- Below Los Angeles County Average

The City Project  
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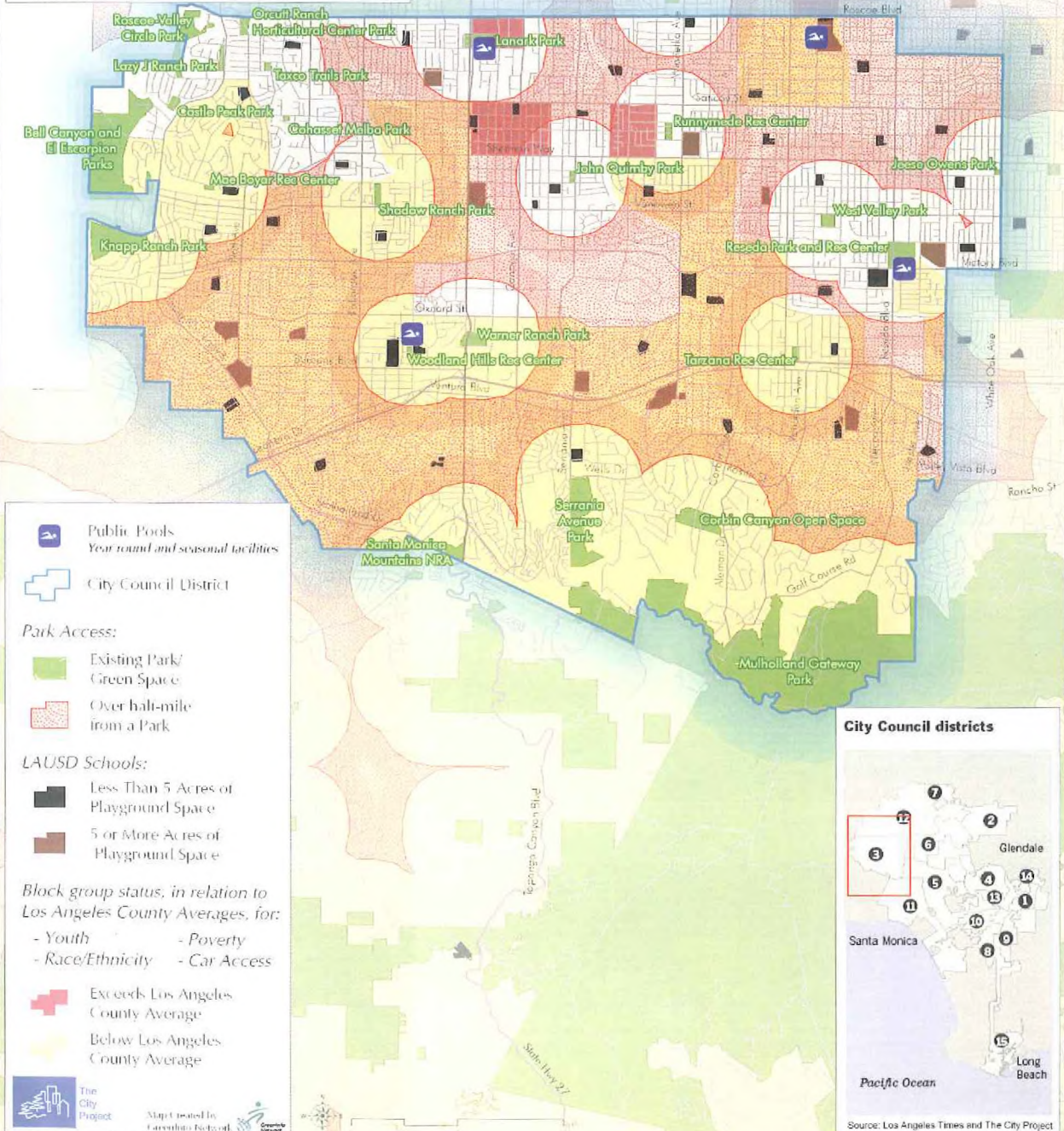
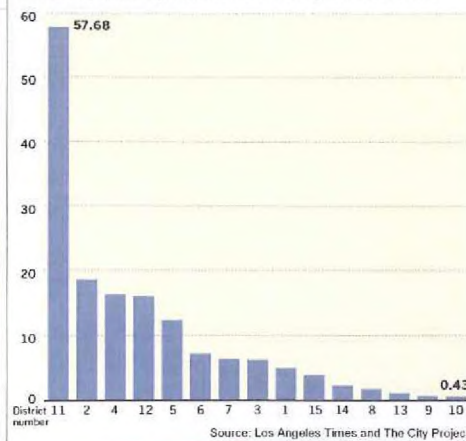


# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

City Council District #3

Dennis P. Zine

Acres of parkland per 1,000 residents, by council district



- Public Pools  
Year-round and seasonal facilities
- City Council District
- Park Access:**
  - Existing Park/ Green Space
  - Over half-mile from a Park
- LAUSD Schools:**
  - Less Than 5 Acres of Playground Space
  - 5 or More Acres of Playground Space
- Block group status, in relation to Los Angeles County Averages, for:**
  - Youth
  - Poverty
  - Race/Ethnicity
  - Car Access
  - Exceeds Los Angeles County Average
  - Below Los Angeles County Average

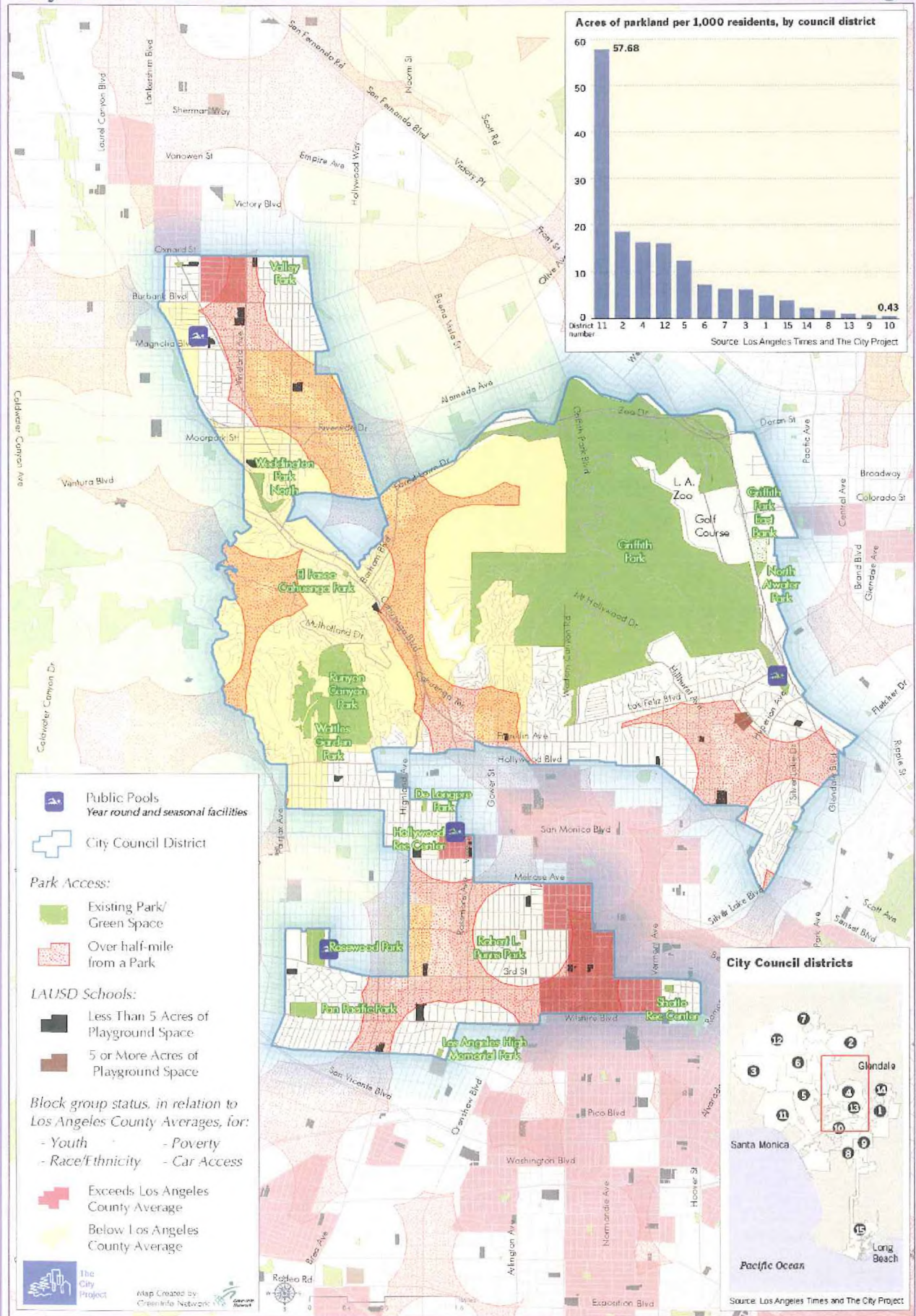




# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

City Council District #4

Tom LaBonge

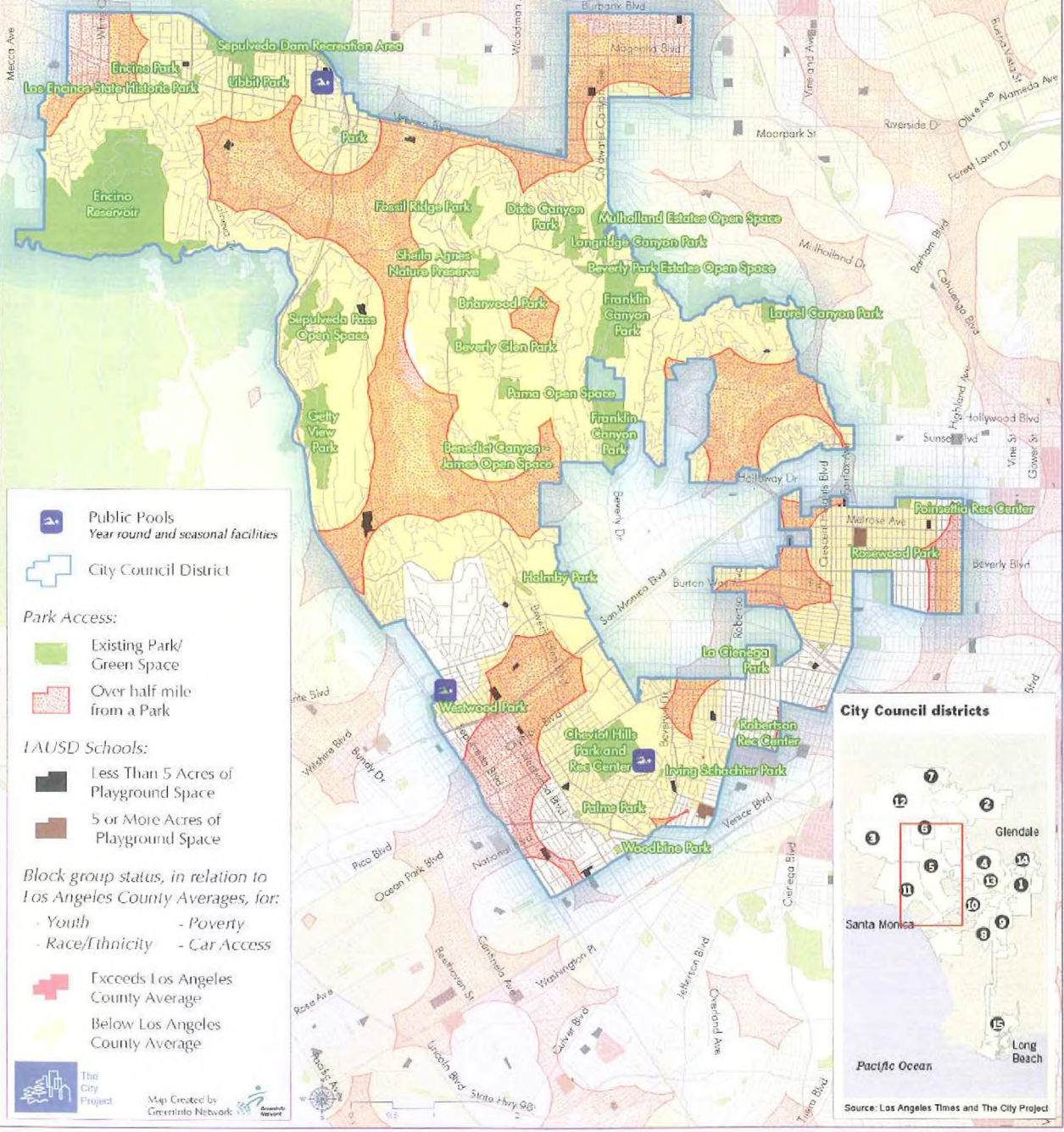
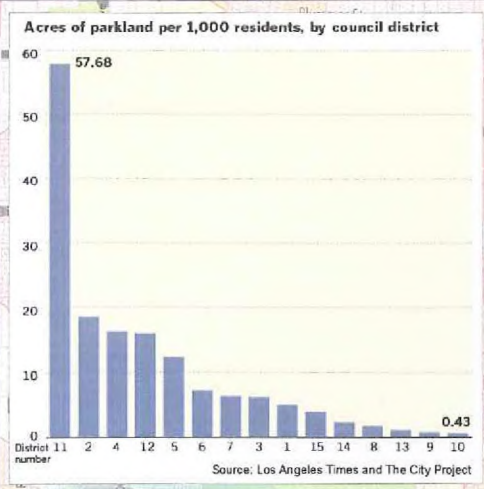




# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

City Council District #5

Jack Weiss



- Public Pools  
Year round and seasonal facilities
- City Council District
- Park Access:**
  - Existing Park/ Green Space
  - Over half mile from a Park
- LAUSD Schools:**
  - Less Than 5 Acres of Playground Space
  - 5 or More Acres of Playground Space
- Block group status, in relation to Los Angeles County Averages, for:**
  - Exceeds Los Angeles County Average
  - Below Los Angeles County Average

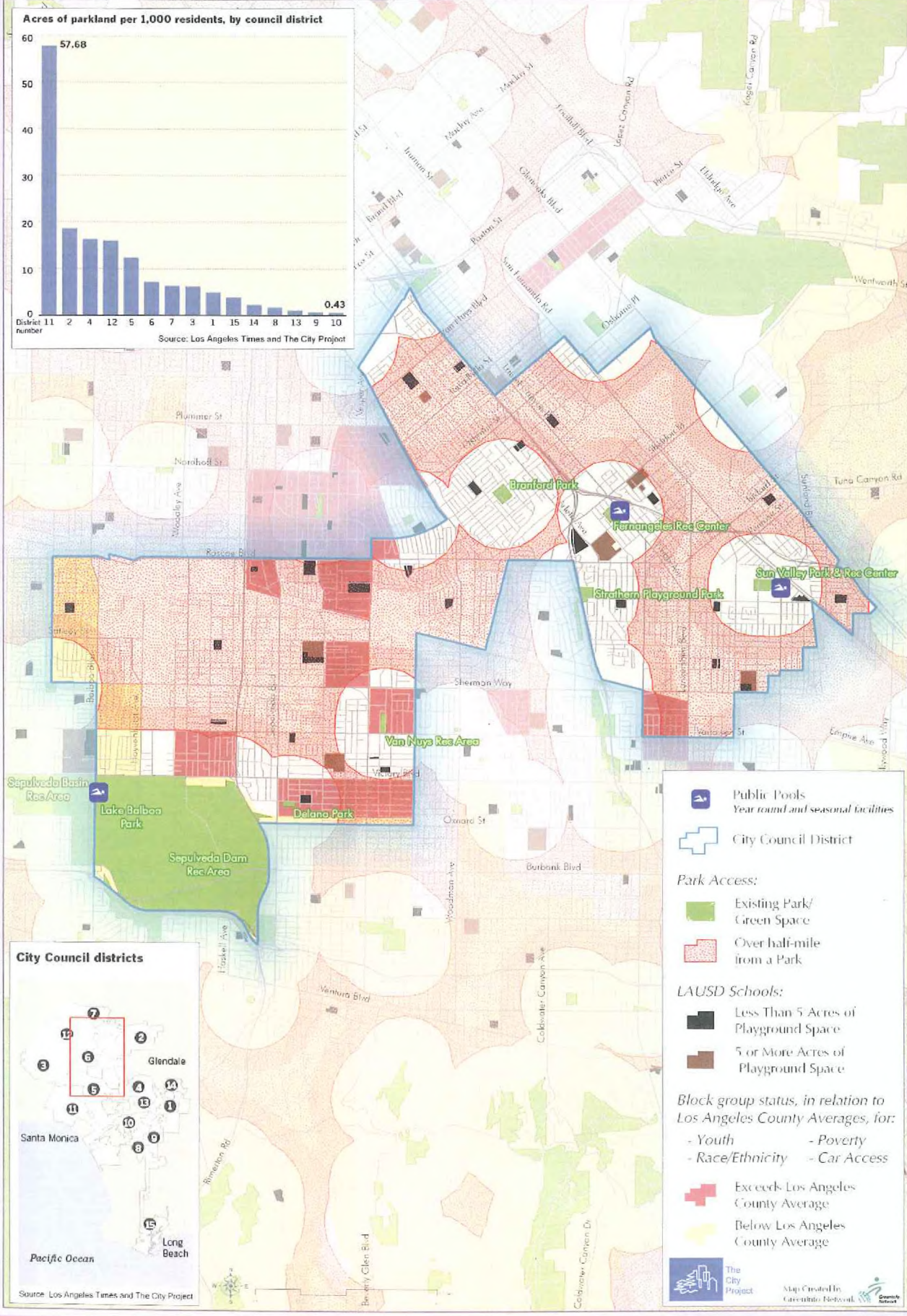
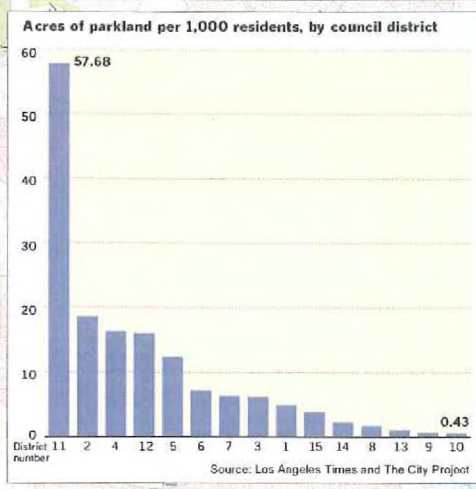




# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

City Council District #6

Tony Cardenas



- Public Pools  
Year round and seasonal facilities
- City Council District
- Park Access:**
  - Existing Park/ Green Space
  - Over half-mile from a Park
- LAUSD Schools:**
  - Less Than 5 Acres of Playground Space
  - 5 or More Acres of Playground Space
- Block group status, in relation to Los Angeles County Averages, for:**
  - Youth
  - Poverty
  - Race/Ethnicity
  - Car Access
- Exceeds Los Angeles County Average
- Below Los Angeles County Average

The City Project  
Map Created By  
Greenbelt Network

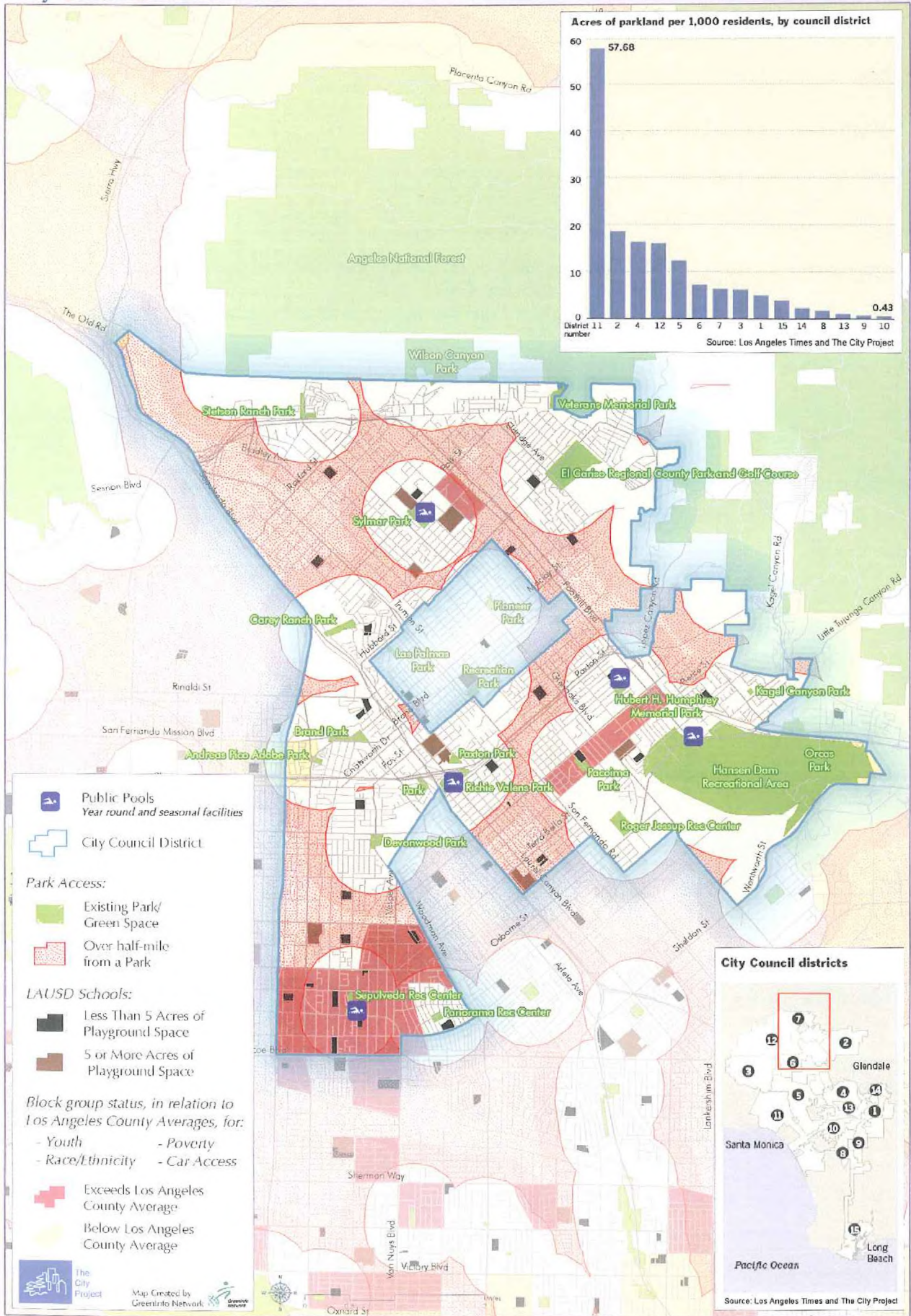


# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

BYCID7

City Council District #7

Richard Alarcón

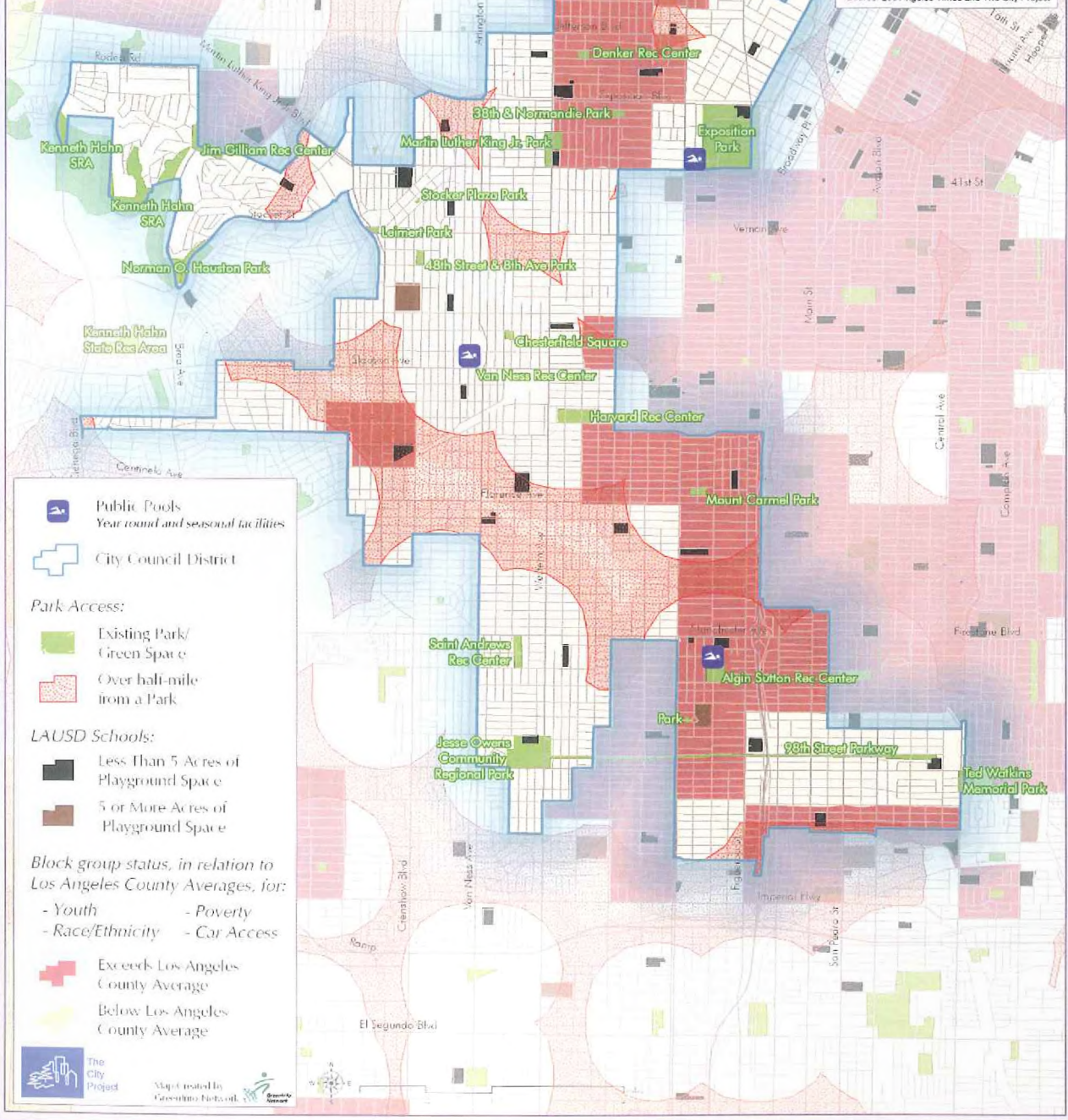
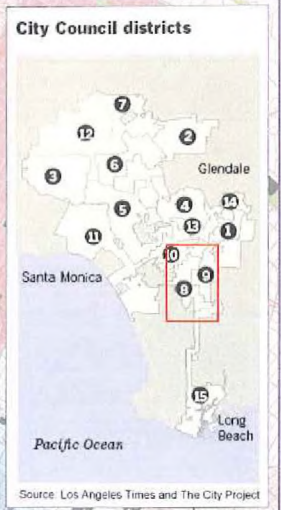
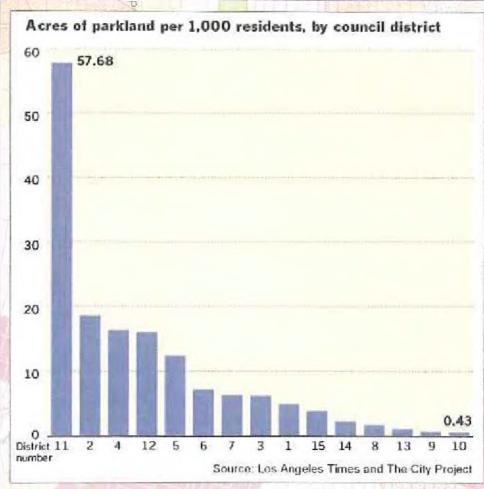




# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

## City Council District #8

## Bernard C. Parks

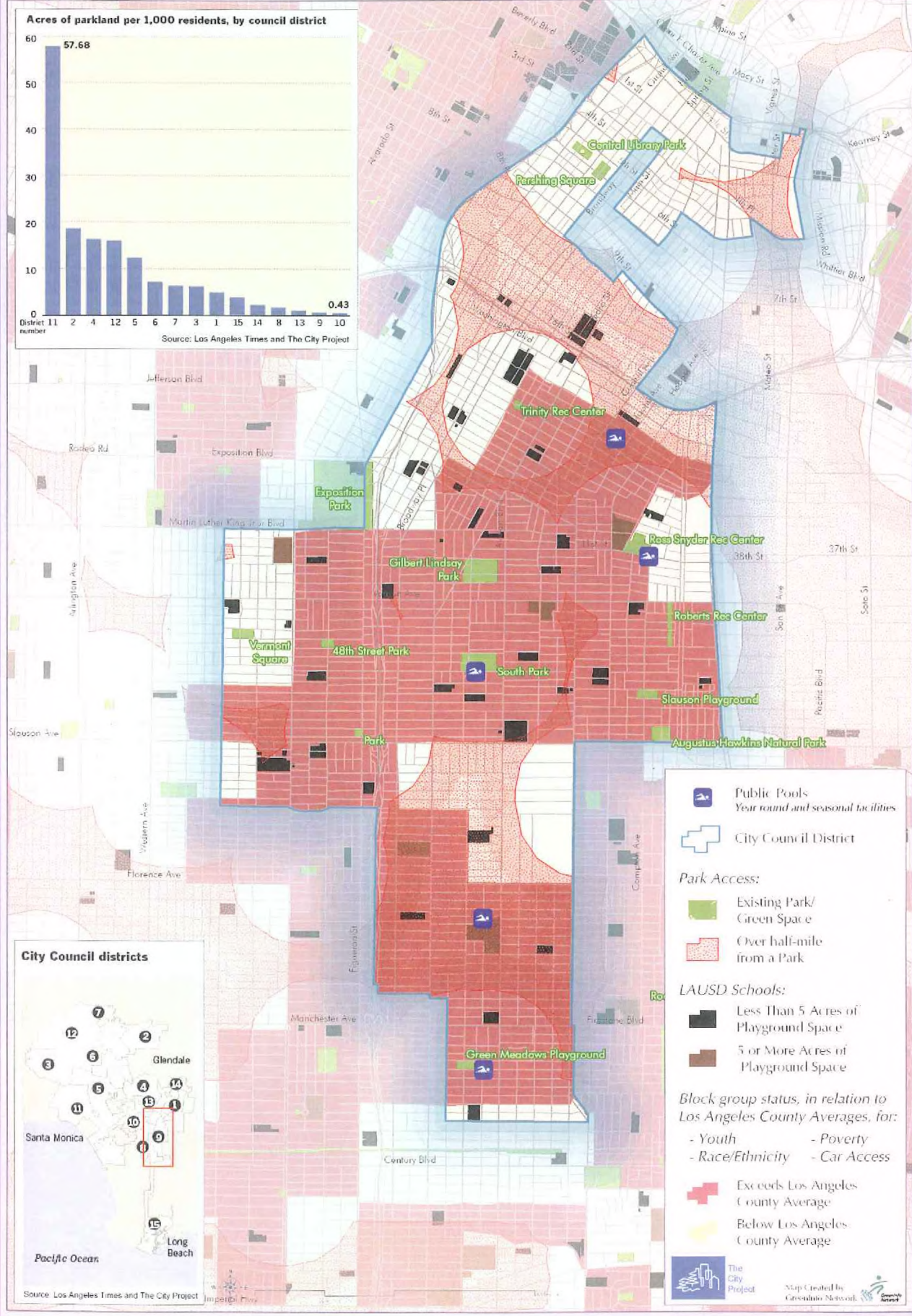
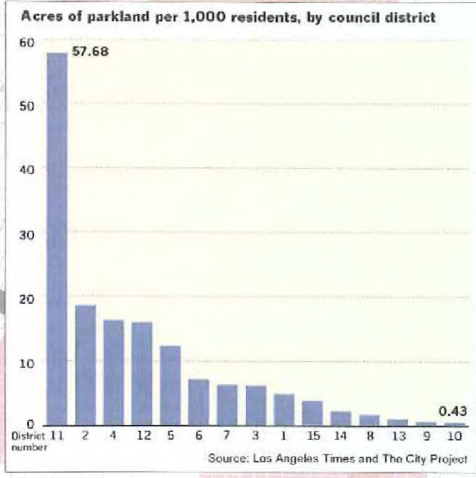




# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

City Council District #9

Jan Perry



- Public Pools  
Year round and seasonal facilities
- City Council District
- Park Access:**
  - Existing Park/  
Green Space
  - Over half-mile  
from a Park
- LAUSD Schools:**
  - Less Than 5 Acres of  
Playground Space
  - 5 or More Acres of  
Playground Space
- Block group status, in relation to Los Angeles County Averages, for:**
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  - Race/Ethnicity
  - Car Access
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County Average
- Below Los Angeles  
County Average

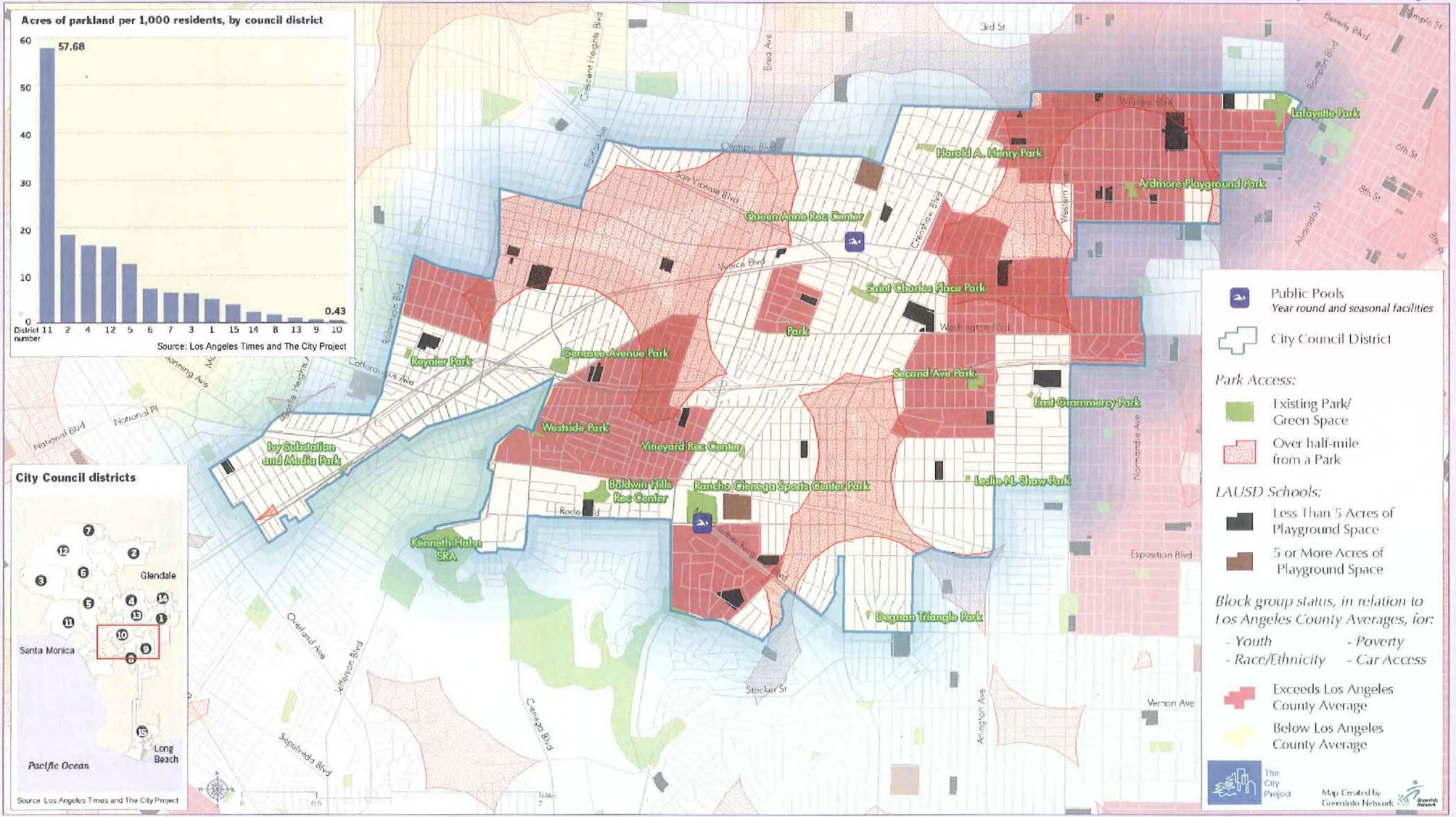
The City Project  
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# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

## City Council District #10

Herb J. Wesson Jr.

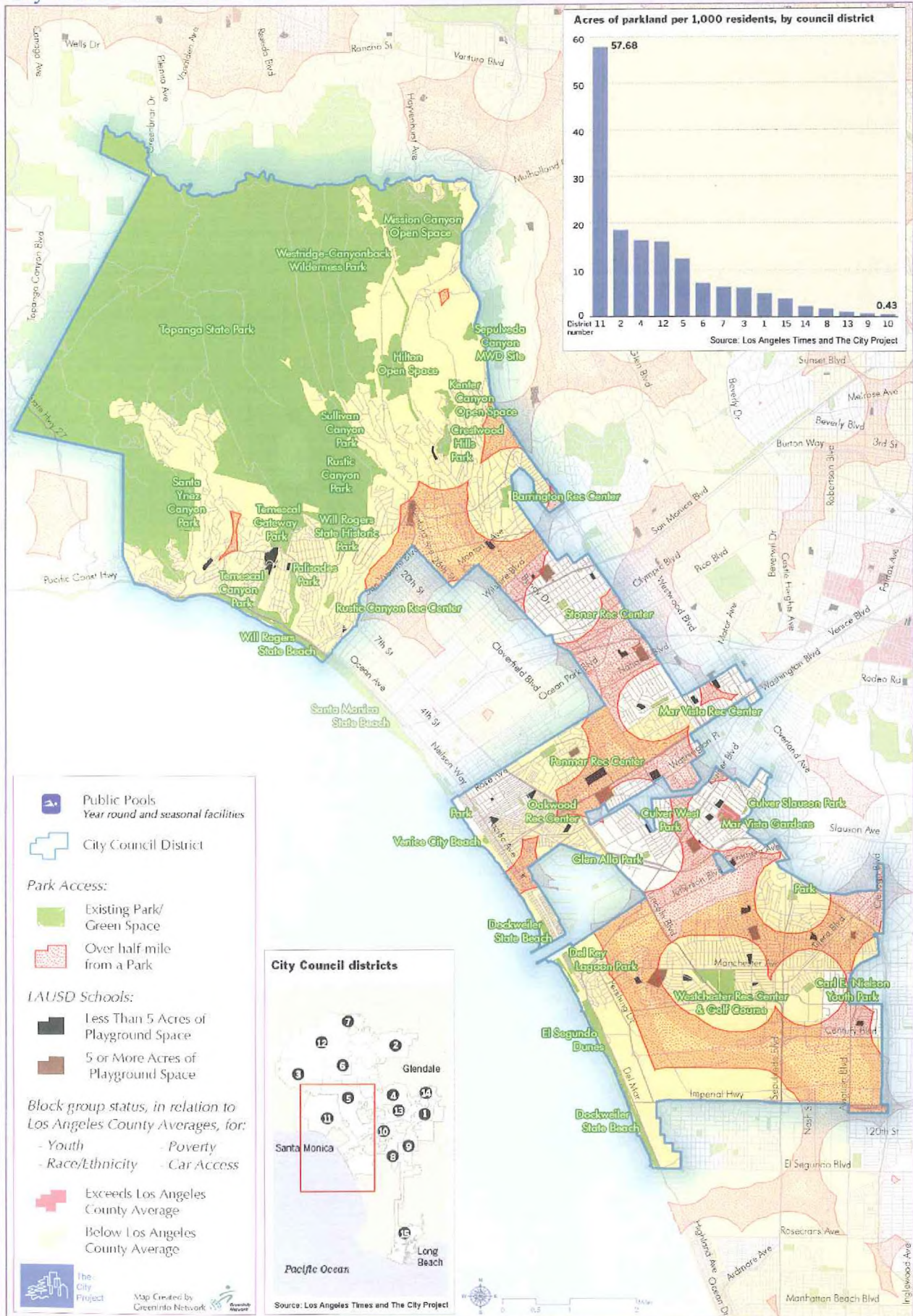




# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

## City Council District #11

Bill Rosendahl

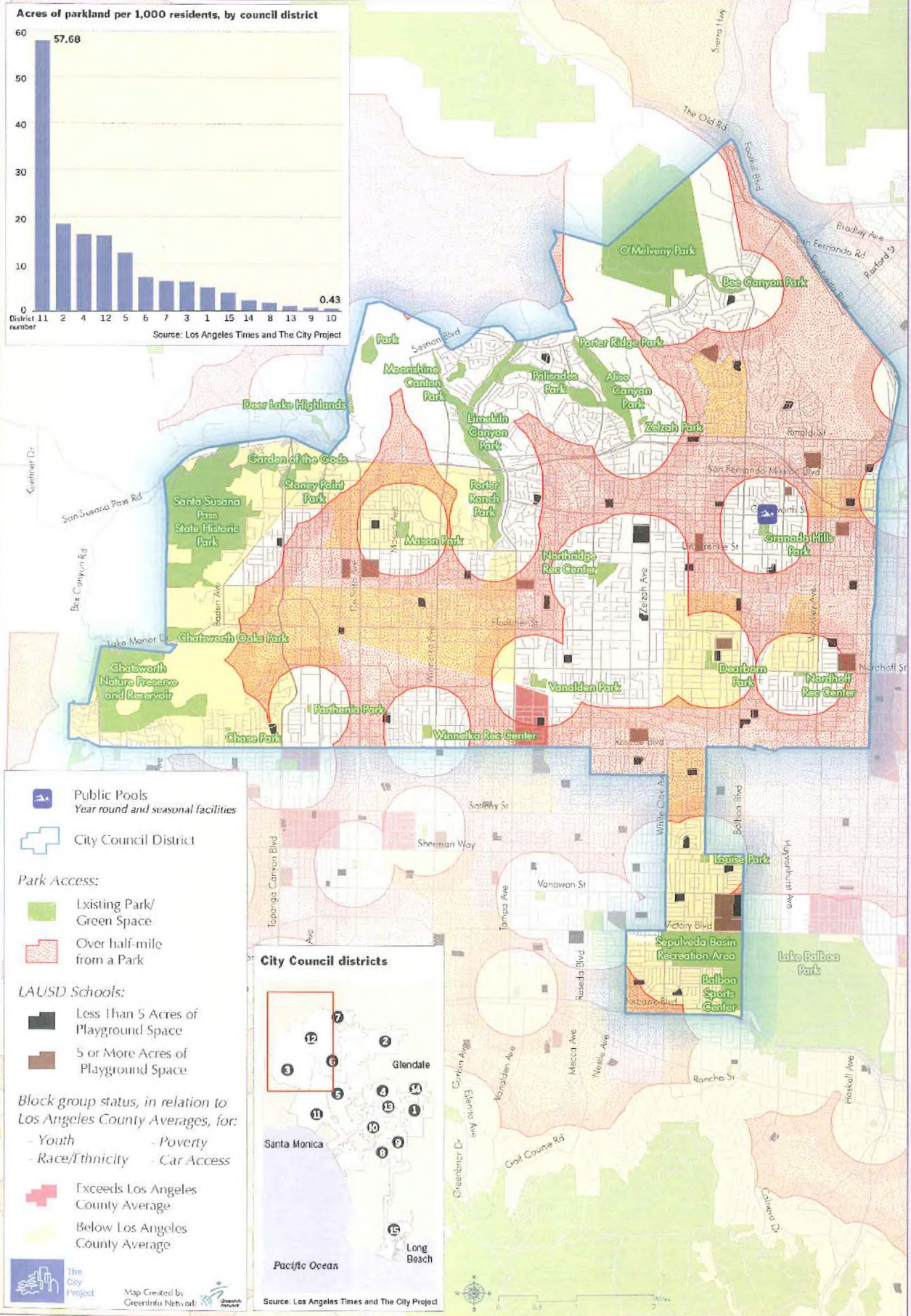
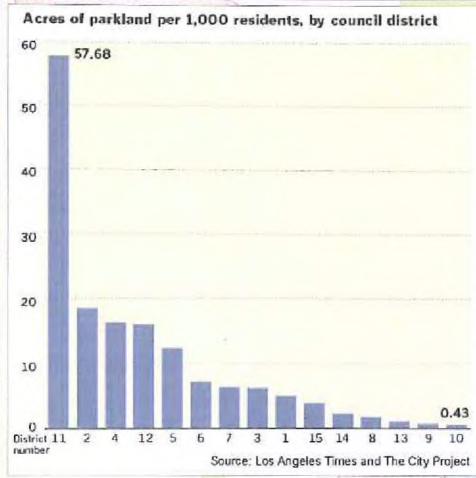




# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

## City Council District #12

Greig Smith



- Public Pools  
Year round and seasonal facilities
- City Council District
- Park Access:**
  - Existing Park/  
Green Space
  - Over half-mile  
from a Park
- LAUSD Schools:**
  - Less Than 5 Acres of  
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Playground Space

**Block group status, in relation to Los Angeles County Averages, for:**

- Youth
- Poverty
- Race/Ethnicity
- Car Access

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- Below Los Angeles County Average

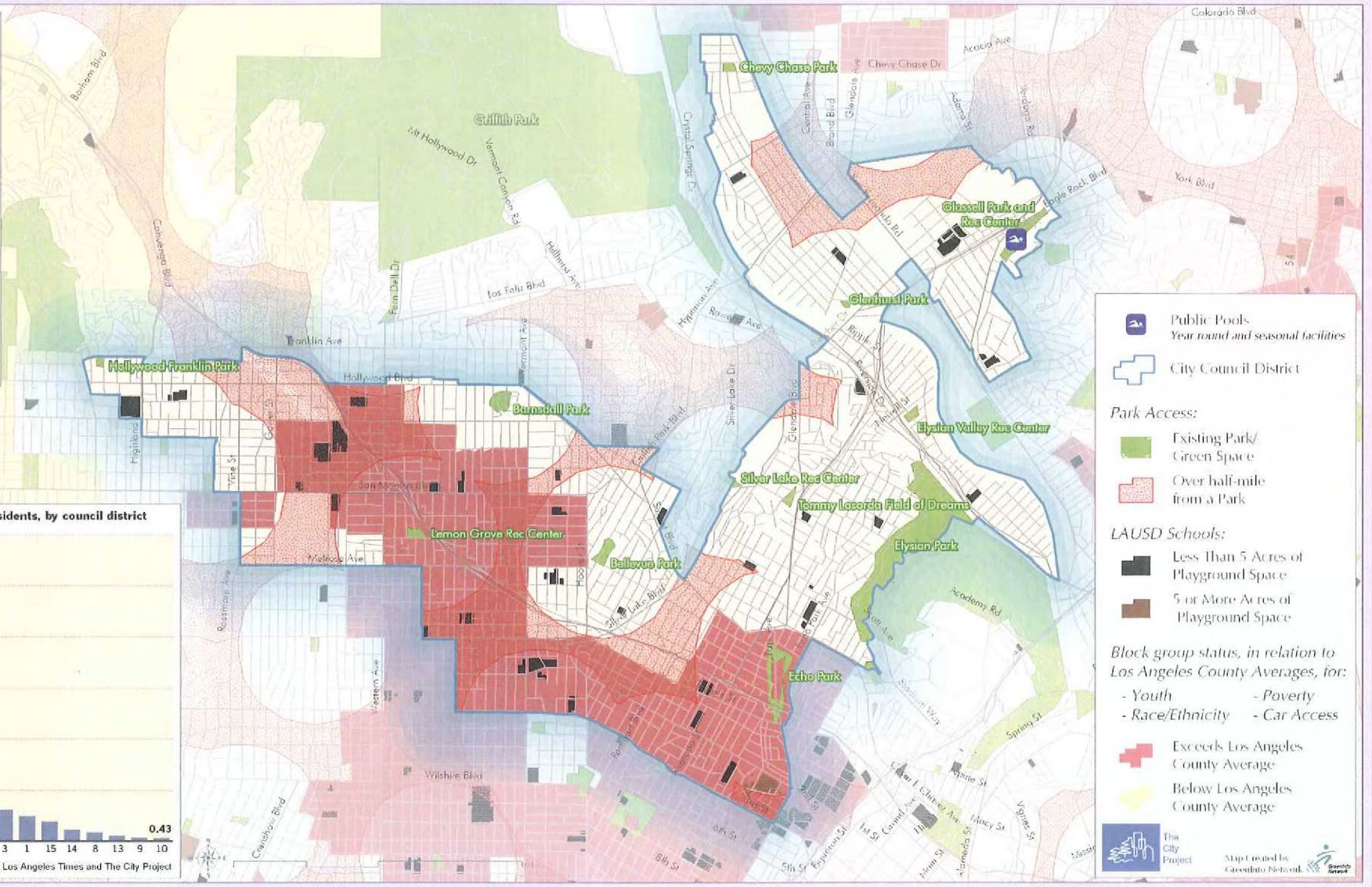
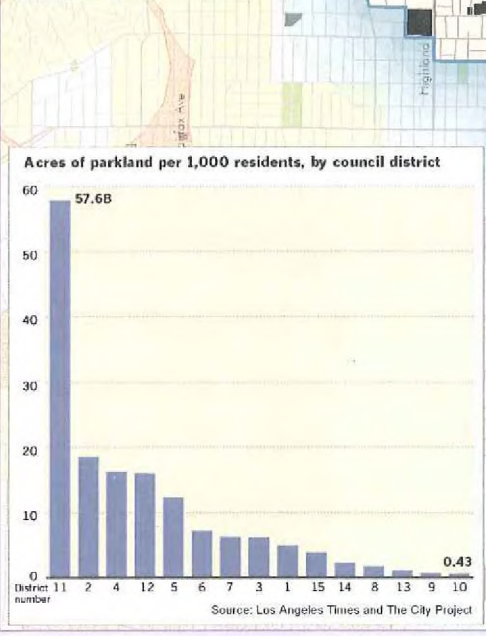




# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

City Council District #13

Eric Garcetti



- Public Pools  
Year round and seasonal facilities
- City Council District
- Park Access:**
  - Existing Park/ Green Space
  - Over half-mile from a Park
- LAUSD Schools:**
  - Less Than 5 Acres of Playground Space
  - 5 or More Acres of Playground Space
- Block group status, in relation to Los Angeles County Averages, for:**
  - Exceeds Los Angeles County Average
  - Below Los Angeles County Average

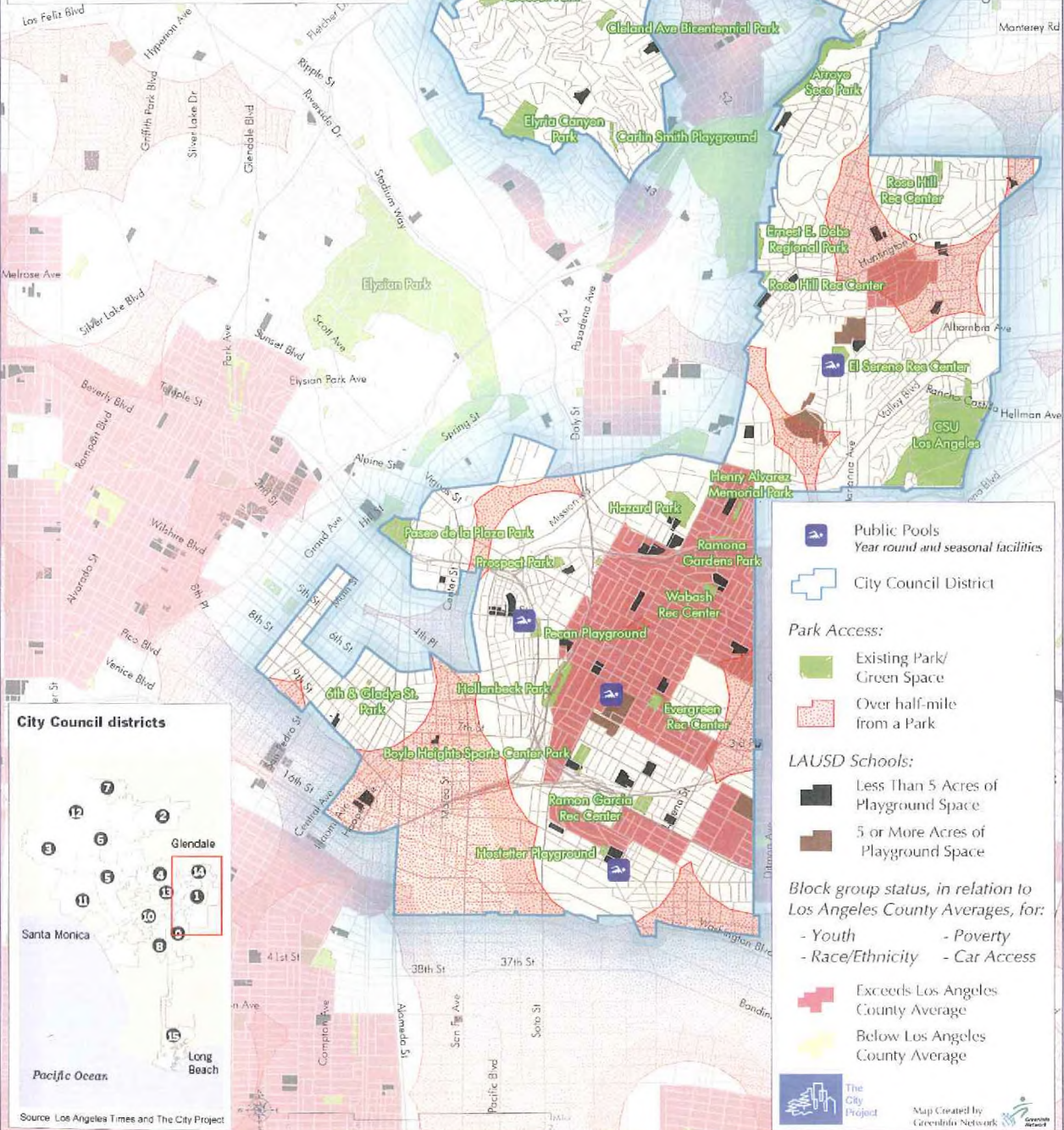
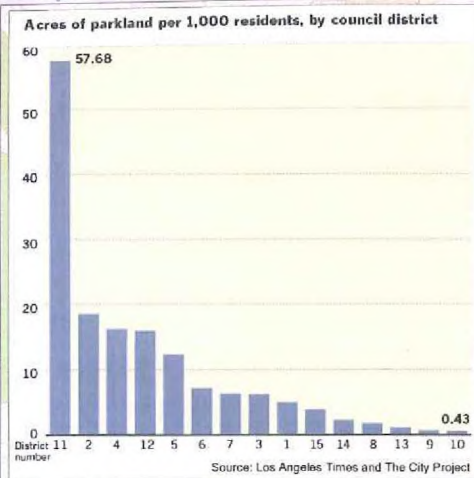
The City Project  
Map created by GeoStudio Network



# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

City Council District #14

Jose Huizar



- Public Pools  
Year round and seasonal facilities
- City Council District
- Park Access:**
  - Existing Park/ Green Space
  - Over half-mile from a Park
- LAUSD Schools:**
  - Less Than 5 Acres of Playground Space
  - 5 or More Acres of Playground Space
- Block group status, in relation to Los Angeles County Averages, for:**
  - Youth
  - Poverty
  - Race/Ethnicity
  - Car Access
  - Exceeds Los Angeles County Average
  - Below Los Angeles County Average

The City Project  
Map Created by GreenInfo Network

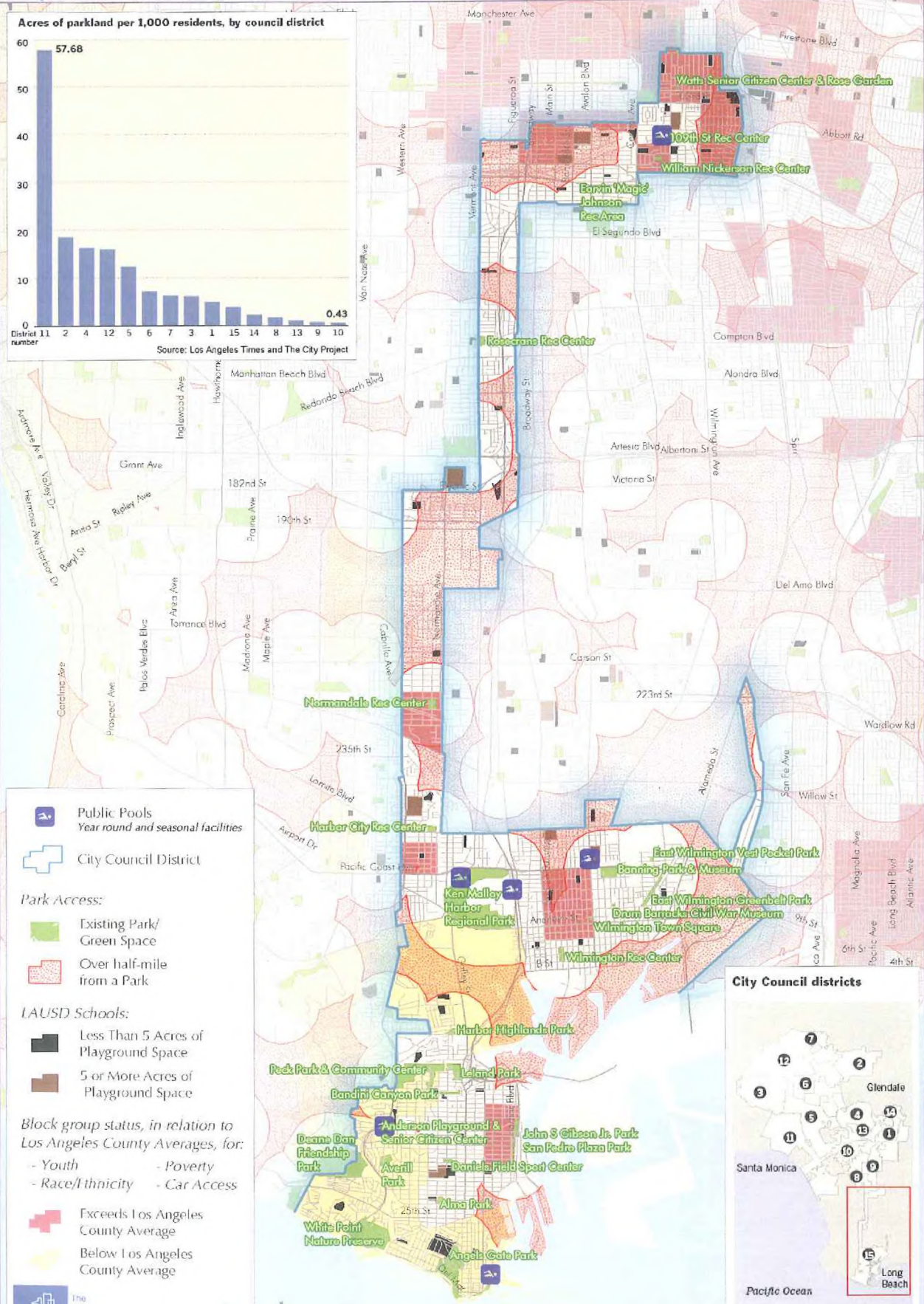
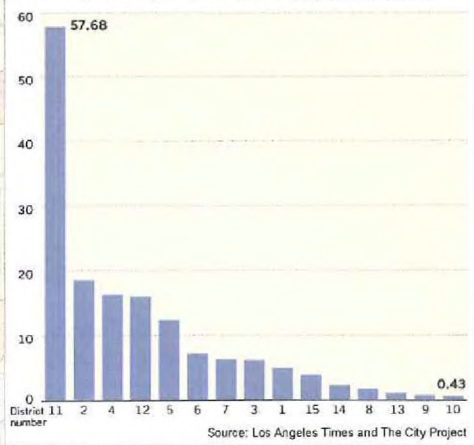


# Park Access and Schools for Children of Color Living in Poverty with No Access to a Car

## City Council District #15

Janice Hahn

Acres of parkland per 1,000 residents, by council district



- Public Pools  
Year round and seasonal facilities
- City Council District

- Park Access:**
- Existing Park/  
Green Space
  - Over half-mile  
from a Park

- LAUSD Schools:**
- Less Than 5 Acres of  
Playground Space
  - 5 or More Acres of  
Playground Space

- Block group status, in relation to Los Angeles County Averages, for:**
- Youth
  - Poverty
  - Race/ethnicity
  - Car Access

- Exceeds Los Angeles  
County Average
- Below Los Angeles  
County Average

