

**Prop. 68 Statewide Park Program Comment Chart (Second Comment Period)**

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#	Document	Page	Comment/Recommendation/Reason	Response
1	Application Checklist Item #12	47	PROJECT SITE PHOTOS The City of Yucaipa supports this requirement. Up to four 8 W' x 11"photos of the PROJECT SITE and its surrounding area. Include captions to orientate the reviewer. Please include at least one panoramic photo that captures as much of the PROJECT possible with a background point of reference for potential "before and after" photos	Noted. Thank you.
2	Application Checklist Item #12	47	Provide up to four 8 W' x 11" sheets with photos of various Community Based Planning MEETINGS per Project Selection Criteria 4 on page 20. The City of Yucaipa strongly opposes this requirement. Yucaipa, and other communities through the years, has been working strenuously to develop future park sites. A review of Yucaipa 's various proposals show that one project , in particular , has been under the purview of California State Parks for several years following acquisition funding through the Land and Water Conservation Fund grant program. Community meetings were held beginning in 2011, and have continued and have been documented throughout the development proposal process. Following voter approval of Proposition 68, the City has been actively holding meetings to further inform residents on the progress of Yucaipa projects. Yucaipa is able to document these meetings, including minutes and surveys, but photographs were not a part of the meeting protocol since taking photographs at meetings is not common practice. Guidelines had not been written nor through any approval process so Yucaipa is precluded from being responsive to the guidelines and under Checklist Items 11 and 12, and specifically excluded from participating in the Statewide Park Development and Community Revitalization Program. One of the City of Yucaipa's most significant park development proposals is being prepared to seek a Conditional Use Permit application which will be addressed before the Planning Commission in February 2019. Yucaipa City Council approved an Agreement for park design, and during public workshops, has reviewed and approved the design. To revert back	<b>Change made.</b> The guidelines photos of the meetings are "preferred". "Preferred" will imply it is not "required".

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			to the City's Agreement with LHA, would require a change order, modifications by LHA, and resubmitting the already approved design back to City Council for approval. This will add costs to current expenditures of nearly \$400,000	
3	Application Checklist Item #12	47	Include a flash drive of the same PROJECT SITE and Community Based Planning photos. High-quality resolution is recommended such as 2048 x 1536 pixels. OGALS may highlight awarded projects at ParksforCalifornia.org.	Noted. Thank you.
4	Application Checklist Item #12	47	Provide one signed Copyright License Agreement (see next page) from the APPLICANT that will cover all photos or video footage that features the public. The City of Yucaipa supports the requirement to provide one signed Copyright License Agreement that will cover photos or video footage that features the PROJECT Yucaipa foresees a potential issue related to private citizen releases.	Noted. Thank you.
5	Expanded Outreach to Eligible Applicants	5, 53	We encourage State Parks to include 501(c)(3) nonprofit affordable housing developers and housing and tenants' rights nonprofit and community-based organizations in its Statewide Park Program outreach efforts. As eligible applicants, these organizations should be encouraged to apply for funding through the Statewide Park Program when they are working in collaboration with local park agencies and/or nonprofit park developers on the development of publicly-accessible park space that will be located adjacent to or within one-half mile of the affordable housing development. By encouraging nonprofit affordable housing developers to apply for Proposition 68 money through the Statewide Park Program, State Parks can help facilitate greenspace development and create access for residents of new affordable housing units, while preventing displacement.	The SPP Team will ask other departments for a contact list(s) of 501(c)(3) nonprofit affordable housing developers and housing and tenants' rights nonprofits. With the contacts, the SPP team will be able to expand SPP outreach efforts.

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6	Additional Points in Criteria	15-30	Awarding additional points to applicants that submit displacement avoidance strategies can help ensure projects serve the people they are built for. State Parks should also award additional points in the scoring criteria to applicants engaged in the joint development of parks and affordable housing and other innovative collaborations. These criteria could be included in the Community Challenges: Economic Conditions category of the Guidelines.	Innovative partnerships are already encouraged in Project Selection Criteria #6. <b>Change made:</b> For partnerships under Criterion #6, the definition of "Health Organizations" now also includes “housing-related anti-displacement strategies” to encourage partnerships with such organizations. The definition now states: "A government, foundation or community-based organization, or private entity with a primary mission of promoting community design principles supporting physical activity, active transportation, social wellness, mental wellness, nutrition, housing-related anti-displacement strategies, and a thriving environment."
7	Technical Assistance	All	State Parks should define “multidisciplinary” and develop a technical assistance program that goes beyond simply providing prospective applicants with guidance on the application process. In order to make the program truly multidisciplinary, we encourage State Parks to include nonprofit park developers and housing and tenants’ rights nonprofit and community-based organizations as Technical Assistance providers Nonprofit TA providers should receive funding. We also encourage State Parks to collaborate with other public agencies to expand the Proposition 68 and Statewide Park Program’s Technical Assistance programs to include information about accessing and leveraging additional public funding to support open space projects (i.e. State and Local Housing Bonds, State Cap and Trade programs, etc.). Additionally, State Parks should provide resources to link potential grantees to Technical Assistance programs offered by other agencies and organizations that can assist with these types of projects. We encourage State Parks to embed tenants’ rights and housing education into the Statewide Park Program’s community engagement and community-based planning requirements. These requirements should include the distribution of information regarding eligibility, services provided, and contact information on local economic security programs and services including tenant education, homeless, and affordable housing resources as a funded component of Proposition 68’s community outreach requirements. The housing and tenants’ rights providers	Accessing other public funding for open space projects: The CA Natural Resources Agency provides an extensive list of funding opportunities for open space projects administered by all departments under the Agency: <a href="http://resources.ca.gov/bonds_and_grants/statewide_bonds_oversight">http://resources.ca.gov/bonds_and_grants/statewide_bonds_oversight</a> . Technical Assistance for Displacement Avoidance Strategies: Applicants will be referred to an informative report titled <i>Healthy Development Without Displacement: Realizing the Vision of Healthy Communities for All</i> by the Prevention Institute. Aboelata, M.J., Bennett, R., Yañez, E. Bonilla, A., & Akhavan, N. (2017). Appendix A (page 22) of this report provides a helpful list of “Housing-Related Anti-Displacement Strategies”. In addition, the SPP team will work with other departments and organizations to form a list of statewide experts willing to volunteer as contacts for potential SPP applicants who may have detailed questions about Housing-Related Anti-Displacement Strategies.

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			should be able to 1) help with the evaluation of applications, specifically around the evaluation of the displacement avoidance strategies, and 2) provide training and Technical Assistance for staff and applicants to refine their displacement avoidance strategies.	
8	Park Acquisition Impacts		We encourage State Parks to work to minimize any direct impacts on land values and existing housing that might occur through parkland acquisition and park development in low income areas. State Parks can achieve this by 1) minimizing advanced public disclosure of the proposed uses of Proposition 68 funds to acquire specific parcels, so as to avoid speculative increases in land value, 2) avoiding funding acquisition projects when purchase prices are based on speculative or inflated land values, and 3) requiring conformance to applicable relocation laws regarding the loss of any housing units demolished in the course of park construction or enhancement. When scoring competitive grant applications, State Parks should give points to organizations and agencies in areas with value capture and other displacement prevention policies in places. Points could be awarded from the Community Challenges, Economic Conditions Project Selection Criterion.	No change needed. The SPP team cannot control what local applicants may reveal when planning a local park project (CEQA filing, permits etc) that may involve acquisition. Acquisitions can only be for fair market value and grantees are required to follow applicable laws.
9	Overall Process - Research & Monitoring		We encourage State Parks to collect, analyze, and report park investment data to monitor for displacement and gentrification. As a part of the on-going analysis of Proposition 68 implementation, State Parks should produce GIS map layers that show the location and size of new Statewide Park Program projects and Proposition 68 investments. State Parks could partner with research institutions, universities, nonprofit organizations, and other public agencies seeking to address displacement and gentrification, to facilitate conversations and share data to support the development of equity and displacement avoidance tools and reports. State Parks should periodically evaluate how displacement avoidance policies are being implemented and make adjustments as needed to lessen the likelihood of displacement and gentrification as a result of park development and enhancement projects.	Thank you for this idea. It will be considered for California's 2020-2025 Statewide Comprehensive Outdoor Recreation Plan (SCORP). The SPP Team will also ask another department if it has considered evaluating how displacement avoidance policies are being implemented.

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10	Anti-Displacement Taskforce	<p>We encourage State Parks to create an anti-displacement taskforce that includes representatives from government agencies and expert stakeholders, including representatives from the nonprofit sector, housing, parks, transportation, and planning. State Parks should support the taskforce’s work to:</p> <ul style="list-style-type: none"> <li>○ identify best practices, reduction of barriers, and opportunities for collaboration that contribute to the development of joint housing and parks projects using local and state funding sources;</li> <li>○ develop an incentive-based system to encourage local governments to adopt broader tenant protection, anti-displacement, and value capture policies;</li> <li>○ facilitate long-term, multi-sector partnerships that leverage private and public funds to sustain community revitalization, neighborhood stabilization, and equitable development.</li> <li>○ create tools such as anti-displacement plan templates and other resources that can be used by communities experiencing displacement and gentrification; and</li> <li>○ partner with organizations and/or academic institutions to document existing gentrification and displacement trends in the state using indicators such as year-over-year changes in property values, ethnicity, income, and the rate of property sales.</li> </ul>	<p>Thank you for this idea. The SPP Team will also ask another state department if it has considered an anti-displacement taskforce and obtain more information about these anti-displacement housing policy ideas.</p>
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11	Criterion #1	25	<p>The Community Fact Finder makes it very easy to measure park acres per 1,000 residents; however, it does not accurately capture a realistic picture of lack of park space for rural communities, many of which are considered disadvantaged or severely disadvantaged. Unlike urban communities, rural communities are spread out over large areas. Many of these communities are made up of several small “towns” that mainly consist of residences, but do not have central areas found in most urban areas. These “towns” do not have grocery stores, gas stations, parks or any other services. It is very common for residents in these communities to drive several miles to get to the nearest public park area central community area. Because rural community populations are dispersed over a large area, it does not make sense to create park areas or central gathering areas in each small “town.” They would not get enough use to make them viable and there is not the financial means feasibly maintain them. Rural residents understand this and are happy to drive several miles to use the nearest community park or grocery store. In fact, they consider that park as their own community park. Please consider an alternate way of scoring this criteria that takes into account rural communities. It may be best keep the half mile radius and to add an option to gain extra points for communities less than 5,000 or 10,000 people through an explanation of the population and area they serve as the local “neighborhood”. This fact, puts rural communities at a severe competitive disadvantage with the current scoring criteria. For example, a rural community with 5 acres of park land that wants to expand its park by 1 acre may only have 500 residents within ½ mile. According to the factfinder, that would mean there are 10 acres per 1,000 residents. In reality, that community park is the primary park for 5,000 residents dispersed over several miles in all directions. Again, this park is considered the local community park for all of those residences. It is different than people from other communities coming to a park in a better community because they like that park, which often happens in urban areas. Our project,</p>	<p>Rural areas were competitive in Rounds One and Two of this program. While rural areas make up approximately eight percent of the state's population, rural areas were awarded more than double that percentage of total funds available in prior rounds of this program. Project Selection Criteria #9 is designed for applicants to discuss the community's challenges beyond the Factfinder data; the challenges of extremely rural areas where there are no grocery stores, gas stations etc in towns should be described in Project Selection Criteria #9. In addition, Step 4 on page 8 of the Community Factfinder Handbook at <a href="http://www.parks.ca.gov/spp">www.parks.ca.gov/spp</a> contains a process to correct park acreage discrepancies.</p>
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		<p>which serves a rural community that is mostly disadvantaged and severely disadvantaged will be less competitive for this very reason. We have a 1-acre parcel adjacent to the existing community park that was donated to us by a local resident for park purposes. The community has already dedicated an enormous amount of volunteer time in determining the features that will be included at the park and creating its design. However, the fact finder says we have nearly 18 acres of park land per 1,000 residents. Part of this is due to acreage being classified as park land incorrectly. I see that that information can be challenged and I will follow the process to do that (most of the acreage is parking lot, a school property that the community is not allowed to use, and vacant BLM forest land that has no access and is a steep gully). The other reason for the high value is that the half mile radius does not take into account that rural parks serve much larger areas for reasons stated above. Please see the attached factfinder print out of our project site. You will see a very large area of rural residential all around that consider our park their local neighborhood park (“local” and “neighborhood” have a much, much larger radius in rural communities). You will also see that most of the area is disadvantaged or severely disadvantaged. The other “park” areas you see around are not community parks. They are just densely vegetated parcels owned by federal government that have no real access or features for the public. I am assuming they are classified as public park simply because they are owned by a public agency.</p>	
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12	Criterion #4	19-22	<p>We recommend that the five meetings go back to July 2017. Planning takes longer for small, disadvantaged communities who have agencies with small staff and who can't afford consultants to run the planning process. For example, our community began holding planning and design meetings in December 2017. Each meeting we have had built on the previous as the community worked together to reach consensus on park purpose and features. Because we have small staff that also are responsible for water, sewer and fire services, it takes at least 3 months to process all of the information gathered at the meeting and to prepare everything for the next meeting. This includes creating new landscape architecture drawings, which were completed by a local landscape architect who volunteered his time. The five meetings since June 2018 are easy for a large agency with plenty of staff or money to pay for consultants, but it is much more difficult for smaller agencies with small staff and volunteers. The information we've been gathering and building with for our meetings is current and relevant and is by no means outdated. The meetings held before June 2018 should count toward our community based planning.</p>	<p>Please see the technical assistance for Project Selection Criterion #4 on page 59 which states "It is recognized that in some cases the project may be driven by a general or park master plan process. Meetings may have occurred years ago. If a potential project concept is driven by a previous plan, the applicant should take the plan design and ground-truth it with the current residents following goals 1-3 on page 23 in order to obtain maximum points. Some parts of goals 1-3 may lead to design enhancements." Applicants will have over six months until August 2019 to prepare applications, and there will be at least one more round in 2020 or later.</p>
13	Acquisition	5	<p>We continue to suggest that acquisition projects where a recreation feature is planned but not available at close of escrow should be eligible as well. Applicants could describe how project site will be used for recreation in the future, or how and when recreation features will be constructed following acquisition. It just does not seem feasible to complete both acquisition and development (and related CEQA) in a grant performance period that ends in 2022. Please also note that there should be a description on p.46 of CEQA requirements for an acquisition-only project (where a trail already exists on-site and development is unnecessary, for example).</p>	<p>Public Resources Code Section 5645 requires grant projects that result in a "fully useable" park. By final grant payment, the project site will include a "fully useable" recreation opportunity. If an acquisition-only grant project will not result in a fully-useable recreation opportunity, the grant project must also include development of the site to allow for public use by final grant payment. The intent is to provide at least one recreational feature open to the public at the time of grant closeout. CEQA requirements are the same for an acquisition-only project, resulting in either the Notice of Exemption or Notice of Determination and the CEQA Compliance Certification Form.</p>
14	Community Access	6	<p>Thank you for creating a separate competitive application process for Community Access programs. We request that this program dedicate a full 5% of the total funding available for the SPP to community access projects.</p>	<p>Noted. Thank you.</p>



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15	Criterion #3	18	<p>New parks should not be prioritized above existing parks: Thank you for removing the language from p.6 of the October application guide that stated “While the program’s priority is to create new parks...” and clarified that a minimum of 20% of funds available will go to existing park projects. Furthermore, we are happy to see that an application can receive seven points (rather than six) if the project will renovate an existing park where it is not feasible or desired to create a new park or expand an existing park. Nevertheless, the program still technically prioritizes new parks over existing parks as they can receive 10 points. SB 5 states clearly that the sum of \$725m shall be available to the department “for the creation and expansion of safe neighborhood parks in park-poor neighborhoods.” (PRC §80050). PRC §80051 states that “[o]f the amount available...not less than 20 percent shall be available for the rehabilitation, repurposing, or substantial improvement of existing park infrastructure...” The plain language of SB 5 does not direct the Department to prioritize new parks over existing parks in any way. We continue to request that State Parks treat new and existing parks equally for scoring purposes.</p>	<p>Thank you for noting the clarification that a minimum of 20% of funds available will go to existing park projects, and for noting that seven points (rather than six) will be awarded if the project will renovate an existing park where it is not feasible or desired to create a new park or expand an existing park. Public Resources Code Chapter 3.3, 5646(a) requires preference be given to projects in communities with insufficient or no park space. A community with no park has a greater deficiency than a community with a park. Section 5647(a) states criteria may amplify and clarify guidance to select projects in areas having the greatest deficiencies in parks and facilities. Further, Section 80050(a) of the bond act states the program is for “the creation and expansion of parks in park-poor neighborhoods.” Approximately nine million Californians have no park within a half-mile of their neighborhoods. Therefore, Project Selection Criteria #3 offers a slight point margin incentive for applicants to consider addressing this statewide deficiency of access to park space in underserved communities. With that said, it is also understood that some existing parks are underutilized due to insufficient or outdated facilities. Some of these existing parks may also be ideally located in a high need community where the community clearly can benefit from park improvements. Project Selection Criteria #9.A is designed for applicants to tell the community’s story and summarize the need for the project. Under Project Selection criteria #9, the need for and benefit of improving an existing park in a community may outweigh the need for a new park.</p>
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16	Park Definition	70	<p>Thank you for changing the definition of park in the revised application guide to include school properties “when there is a joint-use agreement and park signage indicating the general public is welcome to use a designated outdoor area, such as a schoolyard for recreation during appropriate hours such as after-school, weekends, and summer.” Public schoolyards are the most heavily used public lands in communities and directly serve the public. In park-poor and underserved communities, public schools often represent a child’s only opportunity to play outside and enjoy nature. Making schoolyards with joint use agreements in place eligible for this program will allow communities to transform schoolyards from mostly asphalt and tree-less landscapes to vibrant green spaces for play and exploration.</p>	<p>Thank you. Schoolyards for recess and physical education are critical for students' physical and social-emotional health. Well-designed schools and parks, combined with physical activity, recreation, and education programs, are all integral for a thriving, healthy community. The development of recreation features on school district property has been and will continue to be eligible under this grant program. Partnerships between eligible applicants and school districts making land available for parks were supported by Round One and Two grant awards under this Program.</p>
17	General Comments		<p>We are excited to see the recommendations we outlined in our comment letter have been incorporated, or plan to be addressed, in the Revised SPP Draft Guidelines released on December 5, 2018, and we believe that these changes will help ensure that every community in the state has access to SPP investments. Specifically, we would like to thank you for making the following changes in accordance with our recommendations:</p> <ul style="list-style-type: none"> <li>• Developing a stand-alone Community Access Program to ensure funds are used for this purpose.</li> <li>• Clarifying the availability of technical assistance during implementation.</li> <li>• Planning to address planning grants and advance payments in separate guidelines.</li> <li>• Strengthening community-based planning as a selection criterion.</li> <li>• Adjusting priority ranking for existing park renovation projects.</li> <li>• Clarifying circumstances where joint-use projects involving schoolyards are eligible and encouraged.</li> </ul>	<p>Noted. Thank you.</p>
18	Community Access Program (CAP)		<p>We are pleased to see that the Department’s updated Draft Application Guide has replaced previous references to “activity funding” being an eligible grant cost with the clear intention to develop a separate competitive community access grant program.</p>	<p>Noted. Thank you.</p>

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19	CAP 5% allocation	<p>Commit the Full 5% Allocation to the Community Access Grant Program – Page six of the updated Draft Application Guide states that “Of the total \$650,275,000, a minimum of 2% (\$13,005,000) and no more than 5% (\$32,513,750) will fund COMMUNITY ACCESS PROGRAMS through a separate application process”. While we appreciate that the Department has acknowledged the importance of requiring that a dedicated amount of funding be committed to the community access program, we request that the Department commit the full 5% (\$32,513,750). The need and demand for community access project and programs across the state is great, but funding opportunities have traditionally been very scarce. A full 5% commitment of funds from the Department would allow organizations to tackle backlogs of much-needed projects, and allow them to reach further into their communities to design and implement projects that will benefit even more residents.</p>	<p>The first round of Community Access Program funding will total \$13,005,000 as a pilot to determine the statewide demand for program funding and to provide technical assistance based on lessons learned from the first round.</p>
20	CAP Public Input	<p>Create a Comprehensive Community Access Program Utilizing Public Input - Similar to the creation of a new park, expansion of an existing park, and renovation of an existing park, community access projects are complex and multi-dimensional. Models and best practices for successful community access projects exist throughout the state, and many organizations are eager to share lessons learned through their close work with their local communities during the past several decades. Therefore, we request that the Department engage and work closely with stakeholders to design and develop the Community Access Grant Program, similar to the inclusive process used to develop Round 3 of the Statewide Parks Program. As longstanding members of our communities, who have spent years understanding their unique needs and designing programs to best support them, we offer the following initial suggestions on how the Community Access Grant Program could be designed to best serve the state: 1) Projects should be required to have measurable elements that tie to other state goals (i.e. California State education standards, Prop 68 goals, Department strategic plans, etc.); 2) Preference should be given to community</p>	<p>This comment will be considered when developing the separate "Community Access Program" guidelines. By spring or summer 2019, a draft Application Guide will be released for public review and comment similar to this SPP comment process.</p>

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			access projects that: a) Connect people with natural landscapes and/or urban greenspaces, with an emphasis on disadvantaged communities, b) Promote an appreciation for the environment and natural resources, c) Outline the threats facing the environment and natural resources, d) Include an action component to mitigate threats, make cities more livable, e) Are multi-year programs, f) Serve underserved community members, including youth, g) Promote cultural competency, h) Involve partnership and collaborations that strengthen capacity and reach, and help achieve the common goal of reaching more program beneficiaries and maximizing the benefits associated with state funds, i) Are administered by a community-based organization with a proven track record in providing access program services, and j) Programs that address specific barriers to outdoor access; 3) Projects serving disadvantaged park-poor cities or low-income communities should be exempt from cost sharing requirements; 4) Projects should not have a maximum application amount; and 5) All relevant direct and indirect costs should be eligible for funding.	
21	Criterion #4	20	We request that 4 points be awarded to applicants that facilitated at least three meetings, between June 5, 2018 and the application deadline AND conducted at least two meetings before the application deadline but not earlier than January 2015	No change. Economically disadvantaged areas statewide will be able to consider this significant new funding opportunity that became available through the passage of the Prop. 68 Bond Act on June 5, 2018. Meeting schedules should consider residents who otherwise may be unable to attend a meeting during their work hours, or were not part of a meeting that occurred years ago.
22	Criterion #4C	22	State Parks should consider unintended consequences of Goal 1. While we wholeheartedly support the intent of Goal 1, we are concerned that goal may lead to a homogenization of park amenities across parks. Further, it may decrease the ability for professional designers, community organizers, and park professionals to translate/interpret the community's needs and desires into well-tailored facilities, especially in communities with a critical lack of park space where "off-the-shelf" amenities may not be the best option. We recommend that State Parks consider awarding full points to	No change. Based on experience with 900 statewide applications, Goal 1 does not lead to homogenization of park amenities across parks. Goal 1 does not give priority to "off-the-shelf" amenities. Goal 1 allows residents to provide design ideas to park professionals for well-tailored facilities representing the needs of each unique community. Practical ideas come from neighborhood and community residents, when given the meaningful and inclusive opportunity to contribute to a park's design in partnership with professional designers, community organizers, and park professionals.

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			projects where pre-populated design palettes are presented to the community after an iterative, inclusive, and participatory process that directly respond to the needs and desires expressed at previous meetings. We feel this is a responsive strategy to promote innovation and equity in communities with a critical lack of park space.	
23	Criterion #5	24	We request the inclusion of a caveat that the scope of work between the applicant and the Conservation Corps could be subject to change if a change in scope occurs within the awarded grant	No change. The proposal will reflect what both the applicant and Corps agree to complete. The integrity of the competitive grant process must be maintained. If an unforeseen circumstance occurs after grant award, it will be subject to review by OGALS' Grant Administration team using a robust scope change evaluation process.
24	Criterion #9A	31	A list of examples should be provided to applicants for clarity.	No change. Please see the definition of "Community Challenges" for ideas. Since each community has its own unique challenges, Criteria #9-A is designed to give flexibility for applicants to describe the community's need for the project without requiring a specific metric.
25	Criterion #9C	31	Project readiness is a bit unclear. Additional detail and indicators of readiness would be helpful to potential applicants.	Clarification added. The entire Application Package (see Checklist on page 11) is designed to lead applicants towards project readiness. Applicants will demonstrate project readiness by completing the application requirements including checklist item #7, Project Timeline Form. This clarification is added to the Technical Assistance section for Criteria #9C on page 31
26	Criterion #9	32	CalEnviroScreen 3.0 should be used as a standard metric for applicants to describe community challenges, and more points should be given to projects that are located in Significantly Disadvantaged Communities (SDAC) or Disadvantaged Communities (DAC).	No change. Project Selection Criteria #2 A ranks Median Household Incomes on a sliding scale. This sliding scale will give advantage to projects in lower income areas. Project Selection Criteria #9A is designed to allow the applicant to describe the community's challenges.
27	Checklist Item #4	35	State Parks should evaluate the burden on large agencies to process the resolutions as a condition to application submission. Given the difficulty and time intensiveness to get resolutions on large agencies' governing Board's calendar, we request that draft resolutions be submitted as a condition for application submission and that approved resolutions be submitted soon after notification of award but as a condition to contract execution.	No change. The Application Package instructions on page 11 states that a placeholder can be given when a document is not ready at the time of application. The Authorizing Resolution is a common example where some agencies need extra time to file the Resolution. For this upcoming round, applications will be due in August 2019. The Resolution should be received by October 2019. Based on past experience, all statewide applicants are able to send resolutions in this robust window of time.

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28	Checklist Item #10	48	As with the guidelines on willing sellers, we recommend that back-up documentation for lease agreements be presented as a letter of intent or a draft lease agreement. Often, lease agreements will not be executed unless funding is place.	No change needed. This request is covered on page 2 of the "Lease Agreements and Turn Key Agreements" document at <a href="http://www.parks.ca.gov/spp">www.parks.ca.gov/spp</a> .
29	Eligible Costs	53	Permits; premiums on hazard and liability insurance to cover personnel or property; fidelity bond premium cost; and bid package costs should be eligible costs for construction costs if directly related to the implementation of a construction project.	No change needed. These are examples listed as eligible costs in the Eligible Costs Chart. If these are necessary before construction can begin, they are within the 25% "pre-construction" allowance of the grant amount. If these are not necessary before construction begins, and are obtained during the construction phase instead of before the construction can commence, the 25% cap on pre-construction costs may not be applicable.
30	Ineligible Costs	54	In limited and narrowly-defined instances, off-site improvements should be considered as eligible costs if they are necessary to the success of the project. Examples include, curb-cuts for ADA access, sidewalk repair, and tree planting in front of entrances.	No change. Curb cuts and sidewalk repair in the park are eligible as is park entrance tree planting. Work outside of the park is not eligible.
31	Meetings Definition	71	We request that the definition of meeting be expanded to include engagement opportunities at existing events. More direct and participatory engagement should be required the higher the project budget.	The technical assistance section on page 59 mentions engagement opportunities at existing events as a possibility. Based on comments received, a majority feel that 5 meetings are adequate for the maximum grant amount. The goal of the program is to design a project based on the unique needs of a community's residents regardless of the project budget amount.
32	General Recommendation		State retention should be 10%. The California Contract Code caps retention for contractors at 5%. The difference between a contractor retention and the State's retention is covered by the applicant and could be a burden for some organizations. Reducing the size of this variance is critical to engaging smaller, non-traditional partners.	The "Grant Administration Guide for Prop. 68 Competitive Programs" will be available for public review and comment in early 2019. This comment has been forwarded to OGALS' grant administration team.

**Prop. 68 Statewide Park Program Comment Chart (Second Comment Period)**

The far left column provides comment numbers. The middle column provides the comments received between December 5 – December 31, 2018. Responses to the comments are provided in the far right column. This was the final comment period leading to the Final Application Guide dated January 22, 2019.

33	General Recommendation	A portion of grant funds should be able to be used to hire community-based organizations to conduct work on the applicant's behalf. Community-based organizations should be selected on a non-competitive basis at the discretion of the applicant and be based on the community-based organization's awareness of the issue, relationships in the community, and linguistic expertise, among other factors.	Applicants have the discretion to partner with community based organizations. For services charged to the grant above \$5,000, records of a competitive bid process must be kept or a waiver must be approved. Refer to the Three Bid Process for Services and Construction Work for Nonprofit Grantees on OGALS' webpage under Grant Administration for further information. Costs may be reimbursed dating back to July 1, 2018, if the grant is awarded through this round. The Grant Administration Guide will cover these rules. The "Grant Administration Guide for Prop. 68 Competitive Programs' will be available for public review and comment in early 2019. In addition, refer to the FAQs
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