

**Comments and responses for Section IV  
Project Selection Criteria # 1 and # 2, pages 24-27 of the December 1, 2008 Application Guide.**

#	Topic	Venue	Comment	Response
94	Project Selection Criteria #1 - Page 24-25 - Application Guide	Fresno Public Hearing	I think the idea is to create parks in high need areas. If you make the radius broader, it takes in areas of less need (higher park acreage and incomes) Our City supports the ½ mile radius.	Your understanding is correct.
95	Project Selection Criteria #1 - Page 24-25 - Application Guide	Fresno Public Hearing	Our City also agrees with the ½ mile radius.	Noted.
96	Project Selection Criteria #1 - Page 24-25 - Application Guide	Fresno Public Hearing	I'm glad Central Valley is being considered- If a city has a ratio of 10 acres of parkland per 1,000, but you place project in area with no parks per 1,000 residents- it won't show that the city has a lot of park acreage. On reverse, a city can have low total park acreage, but area within ½ mile radius does have high park acreage. Does not take into account that the city as a whole has low park acreage.	The key to this program is to place projects in those critically underserved communities. Cities often have within them communities that significantly differ in economic and recreational resources.
97	Project Selection Criteria #1 - Page 24-25 - Application	Fresno Public Hearing	Our project will be on a 50 acre parcel. Would be better if radius extended to one mile.	The acreage will not be counted if it is not yet protected land open to the public.

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98	Project Selection Criteria #1 - Page 24-25 - Application Guide	Fresno Public Hearing	We support the ½ mile radius.	Noted.
99	Project Selection Criteria #1 - Page 24-25 - Application Guide	Fresno Public Hearing	I appreciate the ½ mile radius. A city may be park rich, but a community in that city may not be.	Correct.
100	Project Selection Criteria #1 - Page 24-25 - Application Guide	Central Valley Letter	Half-Mile Radius Requirement To begin with, we support the program's emphasis on providing parks within communities, but would also like to highlight language from Prop 84 and AB 31 that identifies the need for funding new, regional parks. The half mile radius requirement, in particular, largely removes rural, regional parks from eligibility. The Tuolumne River Trust is interested in applying for funds from this program for the Dos Rios Ranch acquisition, uniquely located at the confluence of the Tuolumne and San Joaquin Rivers. The Ranch is located just 20 minutes from Modesto, the San Joaquin Valley's third largest city, and within approximately 30 minutes	The program's use of the ½ mile radius is two-fold. (1) Help steer applicants towards placing projects in areas that best meet the program's highest priority: Funding projects in critically underserved communities with insufficient or no park space and significant poverty. (2) Uniformly quantify the ratio of park space per 1,000 residents,

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			<p>of residents in Turlock, Patterson, Newman, Riverbank, Empire, Hughson, and Ceres. It is also within an hour of Sacramento and portions of the Bay Area. Therefore, this project would help satisfy the regional demand for park space and provide public access, recreation, and educational opportunities to many nearby underserved communities. As the guidelines are currently written, it appears that the Dos Rios Ranch would not be eligible for this program.</p> <p>We feel that this is inconsistent with the intent of Proposition 84, which states the funds “shall be available for local and regional parks.” This is also inconsistent with implementing legislation for the program, such as AB 31 Sec. 5641 (e), which states that project funds be delivered “...to neighborhood and regional park projects in areas of highest need.”The idea of a regional park in “close proximity” is not defined in either the original bond language or the enabling legislation of AB 31, for example in Sec. 5645 (b). Many of the Central Valley’s communities are rural, and required travel distances to parks are further than in built up, coastal areas. As the State Park’s Central Valley Vision document (p.4) makes clear: “Central Valley residents must travel an average of 50 minutes to reach their favorite recreation areas—up to twice as long as residents of southern California or the Bay Area.” The San Joaquin Valley is a critically underserved region, with the entire valley at a disadvantage for parkland. As stated in the Vision, “The Valley study area is 19%</p>	<p>and the poverty/household median income in proximity to projects, using consistent data available statewide. If the radius were larger, it would encompass higher income areas, or greater park acreage areas, which would disadvantage or disqualify many statewide applications. From discussions during our recent statewide meetings with park professionals on the draft guidelines, we anticipate receiving numerous applications that seek to create new regional and community parks in rural areas that lack parks, and these projects may be quite competitive.</p> <p>As noted, the Central Valley has numerous critically underserved communities. The purpose of this program is to place projects in close proximity to such communities. Many youth, seniors, and families</p>

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			<p>of the area of California but contains only 4% of California's public land." Those recreation areas that do exist, such as wildlife refuges and other agency landholdings, have few recreation facilities. A new regional park such as Dos Rios would provide open space and recreational opportunities for the many nearby communities that have significant concentrations of low income and minority residents. With this in mind, we would propose that rural and regional parks have a separate set of requirements, with a different definition of close proximity than that used for neighborhood parks. This would appropriately increase the competitiveness of the new Central Valley parks as called for in the Vision document, and as sought in the bond language and implementing statutes.</p>	<p>affected by poverty in critically underserved communities lack private transportation to access and use parks on a daily basis when they are located miles away.</p>
101	Project Selection Criteria #1 - Page 24-25 - Application Guide	Greater Central Valley Area Letter	<p>Increase or eliminate the ½ mile radius requirement to include regional parks. There is also a large role for regional parks and areas that contain significant natural resources to provide recreational opportunities for California residents, including low-income residents. Across the state, regional parks are used by many low-income and minority residents. In our community, the two most heavily used parks (by communities of mostly Latino and southeast Asian residents) are county parks on the San Joaquin River. Lost Lake Park and Skaggs Bridge Park are miles away from the City of Fresno or any other heavily populated area, and yet they are heavily used by people in the surrounding communities.</p>	<p>The program's use of the ½ mile radius is two-fold. (1) Help steer applicants towards placing projects in areas that best meet the program's highest priority: Funding projects in critically underserved communities with insufficient or no park space and significant poverty. (2) Uniformly quantify the ratio of park space per 1,000 residents, and the poverty/household median income in proximity</p>

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				to projects, using consistent data available statewide. If the radius were larger, it would encompass higher income areas, or greater park acreage areas, which would disadvantage or disqualify many statewide applications.
102	Project Selection Criteria #1 - Page 24-25 - Application Guide	Greater Central Valley Area, Letter	Keep within the intent of the enacting legislation- these grants are a tremendous opportunity for communities that have been without parks, such as many in the Central Valley, to have a chance at developing the vibrant recreational areas many neighborhoods across the state currently enjoy. The ½ mile park proximity criteria is an important aspect of the overall guidelines as it will lead to the creation of new parks in neighborhoods where none currently exist, enhancing the quality of life for those otherwise park-deficient communities.	Noted.
103	Project Selection Criteria #1 - Page 24-25 - Application Guide	Letter	As you may know, Farmersville and surrounding Tulare County have the unfortunate distinction of being some of the most impoverished places in California. The City of Farmersville overcame significant obstacles to acquire an ideal 23-acre parcel of land for sports field development. However, the land remains vacant and undeveloped. Our community's vision for a Sports Park, has so far, eluded us due to a lack of funding. We have children playing baseball, softball and some soccer on underdeveloped and undersized fields throughout the	AB 31 assigns higher priority to projects in communities with insufficient or no park space. Park acreage per 1,000 residents or median household income in proximity must also be evaluated due to AB 31's eligibility thresholds. If the radius were larger, it would

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			<p>community. We need the development of regulation size fields at this larger, centrally located site to provide the facilities our youth need. .Proposition 84 presents a unique opportunity to obtain the necessary funding to make this dream a reality for our residents. However, we have critical concerns that the current draft guidelines and scoring criteria will not favor a regional park in a rural, less populated, yet underserved, community like Farmersville. In particular, the definition of “proximity” as a ½ mile radius of the project site is problematic. (Page 24, Draft Application Guide) The State’s intent to calculate and award points based on the ratio of usable park space per 1,000 residents based on this definition of proximity penalizes less dense communities or communities like Farmersville. We anticipate that once developed, our large Sports Park will draw users from the entire City and surrounding unincorporated areas, a much larger radius than ½ mile. Furthermore, this methodology will slant the scoring to metropolitan areas that are requesting funds for neighborhood parks in densely populated areas. The enabling legislation for this program did not stipulate this narrow definition of proximity. In fact it recognizes the value and distinction of both neighborhood and regional park facilities.Assembly Bill 31 states that funds will be available for “local and regional parks, and authorizes those funds to be allocated pursuant to implementing legislation, subject to certain considerations, including requiring preference to be given to the acquisition and</p>	<p>encompass higher income areas, or greater park acreage areas, which would disadvantage or disqualify applications for projects in critically underserved communities. The "vacant" land issue noted in your comment: If the "vacant land" is not yet open to the public as park space, it will not count as public space for criteria #1. In other words, the ratio of park space per 1,000 residents will be lower than if the "vacant land" was not vacant and was open to the public as official park space. From discussions during our recent statewide meetings with park professionals on the draft guidelines, we anticipate receiving numerous applications that seek to create new regional and community parks in rural areas that lack parks, and these projects may be quite competitive.</p>

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			<p>development of new parks and expansion of overused parks that provide park and recreational access to underserved communities."The draft guidelines and scoring do not support the regional parks designed to serve a larger population beyond a ½ mile radius point. This unfairly penalizes a critically underserved community like Farmersville in the scoring process. We would recommend a larger radius (2 miles or more) or perhaps using an entire zip code for establishing demographic data and the usable park acreage per 1,000 resident ratios.</p>	
104	Project Selection Criteria #1 - Page 24-25 - Application Guide	Inland Empire Public Hearing and Letter from same Representative	<p>Allow applicants to define radius, or have different radius for regional parks vs. neighborhood parks. The term Proximity is defined as ½ mile radius from the project site. This distance is not an accurate reflection of those residents that will be served by the project. Larger park projects will serve the needs of a Critically Underserved Community beyond the ½ mile distance. The term Proximity should be defined by the acreage of the park for which the applicant is seeking funding. Large regional parks (in excess of 50 acres) should have a Proximity radius of 1-mile and neighborhood parks less than 50 acres should have a ½ mile Proximity radius. This will provide an accurate evaluation of each of the projects while still having neighborhood and regional park projects compete with one another for program funds. This recommendation does not provide a division of funds between neighborhood and regional parks. The term Usable Park Space should be revised and include Park Space that provides the same recreation</p>	<p>We want to clarify that the use of the ½ mile radius starting at the proposed project site is not intended to define a "service area", but instead is used to define "proximity". Projects funded by this program can have a service area well beyond a ½ mile radius. The use of the ½ mile radius is two-fold. (1) Help steer applicants towards placing projects in areas that best meet the highest priority of the legislation. (2) Uniformly quantify the ratio of park space per 1,000 residents, and the poverty/household median</p>

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			<p>features for which the applicant is seeking funding. The current definition implies that every park serves the same population. (For example, An applicant is seeking funding for a passive recreational park project that will serve the needs of the entire community however within Proximity of the project is a Skate Park. The Skate Park should not be calculated as Usable Park Space because it doesn't serve the same needs of the entire community but rather only a select population. Excluding this statement would discredit quality park projects and will not increase park space that can be enjoyed by all.</p>	<p>income in proximity to projects, using consistent data available statewide. If the radius were larger, it would encompass higher income areas, or greater park acreage areas, which would disadvantage or disqualify many applications statewide.</p>
105	Project Selection Criteria #1 - Page 24-25 Application Guide	Inland Empire Area, Letter	<p>Definition of proximity: The City of Colton will apply for a Community Sports Park project in a community where park space is severely lacking. The project will have a regional benefit, but the application would be penalized when compared to another application proposing a neighborhood park in a densely populated area. The narrow definition is not consistent with AB 31 which states "for local and regional parks...and preference to be given to the acquisition and development of new parks and expansion of overused parks that provide park and recreation access to underserved communities". Provide a more broad-based criteria which ensure applications with a regional park project are scored fairly and given equal weight as neighborhood or pocket parks.</p>	<p>The letter related to this comment indicates that the City plans to acquire land for the Community Sports Park- if the land is not yet a park, it won't be counted as existing park space. AB 31 gives higher funding priority to projects located in critically underserved communities with insufficient or no park acreage. From discussions during our recent statewide meetings with park professionals on the draft guidelines, we anticipate receiving numerous</p>



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				<p>applications that seek to create new regional and community parks in rural areas that lack parks, and these projects may be quite competitive. On a side note, if there is only one resident/home within the 1/2 mile radius, and no parks, then there is a ratio of 0 park acres per 1,000 residents.</p>
106	Project Selection Criteria #1 - Page 24-25 Application Guide	Inland Empire Public Hearing	<p>In counting park acreage, differentiate park that is not designed for active use vs. park that is. We have a park that is not designed for active use- should be able to exclude it from counting towards community's acreage.</p>	<p>No change. A park that is not designed for active use is still a park, and therefore is counted.</p>
107	Project Selection Criteria #1 - Page 24-25 Application Guide	Inland Empire Area, Letter	<p>The City of Chino Hills there has been working on obtaining property next to an elementary school to create a park. The neighborhood has over 2,000 homes, is primarily Spanish speaking, moderate poverty, and there is no community park in the area. Our concern deals with the definition of proximity- the school draws children from 2 miles away.</p>	<p><u>IF</u> there is no park within the ½ mile radius, and this project creates a new park, it will score the maximum points for criteria #1 and #3.</p>

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	Project Selection Criteria #1 - Page 24-25 Application Guide	Inland Empire Area, Letter	The definition of proximity disqualifies projects that develop regional parks and the significant poverty population is not in proximity. If an applicant has land dedicated solely for the development of a park or recreation feature but the critically underserved community is shy of the half mile radius, then it is ineligible. Increase the proximity distance to at least a 5 mile radius to allow for more park and recreation facility projects.	If the radius were larger, it would disqualify or disadvantage many statewide applications for projects in communities with a lack of parks and significant poverty because the median income or the park acreage would be inflated by nearby higher income or high park acreage communities.
108	Project Selection Criteria #1 - Page 24-25 - Application Guide	Kern County Public Hearing	Based on definition of park- if you are developing a phase, it seems like you will lose points based on acreage of existing park. If you have a large park that is partly developed, and you want to obtain funding to develop part of the park, it seems like it would be an ineligible project.	A project in an existing large park may not score as well as the creation of a new park in a critically underserved community. However, even if there is more than 3 acres of park acreage per 1,000 within proximity (eligibility threshold), it can still be eligible if it meets the median household income threshold in criteria #2.

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109	Project Selection Criteria #1 - Page 24-25 - Application Guide	Kern County Public Hearing	<p>People will be coming from more than ½ mile to use the new park that we will create. Will come from 10 to 15 miles because features of the park will be different than other parks in city.</p> <p>Maybe work on economy of scale. Our city is park poor- plan on building very large park- several hundred acres. If I develop a 10 acre park, that is much different than a 170 acre park. The scale of the park would depend on how far the range is.</p>	<p>This project is for the creation of a "New park", so the park acreage will not be counted in criteria #1 if the property is not yet protected and open to the public as recreational land. Please see the new February 17, 2009, Application Guide Technical Assistance section. On a side note, if there is only one person who lives within the 1/2 mile radius, and no parks, then there is a ratio of 0 acres per 1,000 residents.</p>
110	Project Selection Criteria #1 - Page 24-25 - Application Guide	Kern County Public Hearing	<p>Acres per 1,000. In the metro area, we don't even have 2 acres of parkland per 1,000 residents. But if we develop a large existing park outside of metro area, we will score less.</p>	<p>Change made to the scoring system for criteria #1 and #2 to allow competition to drive the score. However, even with the change, it may be slightly more competitive to create or improve a park in a critically underserved community compared with this project example.</p>
111	Project Selection Criteria #1 - Page 24-25 -	Kern County Public Hearing	<p>About earlier comments: Our park will not be open to public before date of appropriation- does not count towards park acreage- and also qualifies as a new park (#3). Well that is helpful.</p>	<p>Correct.</p>

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112	Project Selection Criteria #1 - Page 24-25 - Application Guide	Kern County Public Hearing	I have opposite problem- we have a park that will be sold to the State as a courthouse- the parkland will count against us at time of application- will be converted to courthouse in 2010- but we are developing a park across the street.	Parks that exist before the date of appropriation will count for criteria #1. The project will get full points for criteria #3 by creating a new park.
113	Project Selection Criteria #1 - Page 24-25 - Application Guide	Tulare County Area, Letter	Land currently owned by the City of Porterville, and located across a major thoroughfare from the referenced underserved neighborhood, has been selected for acquisition by the State for the purpose of constructing a courthouse along with related judicial and law enforcement facilities. A portion of the land slated for State acquisition is utilized for local park and recreation purposes. Under the current grant guidelines this land would be counted as usable park space, within proximity of the above mentioned proposed project site, and adversely scored as such. However, once the sale of land to the State is complete and it is converted to a courthouse, there will be a critical lack of park space in the proximity of the planned park. Porterville has envisioned utilizing the planned park within the underserved neighborhood to alleviate the critical lack of park space. PROPOSED GUIDELINE REVISIONS:	Parks that exist before the date of appropriation will count for criteria #1. The project will get full points for criteria #3 by creating a new park.

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			<ul style="list-style-type: none"> <li>• A park and recreation facility shall be deemed a new park when it replaces an existing park facility that is displaced by a State agency land acquisition. Existing local park lands to be conveyed by December 31, 2009 to the State for public purposes not controlled by State Parks shall not be considered as existing local parks in determining community park acreage or park adjacency.</li> </ul>	
114	Project Selection Criteria #1 - Page 24-25 - Application Guide	Kern County Public Hearing	Community centers- one of highest needs we identified is community centers, but they need to be in larger parks due to need for parking lot- but wont qualify if you look at larger parks. Penalizes areas out in central valley – competing with large dense areas with low incomes. Need some criteria that give Central Valley a fare shake.	Through our statewide meetings, we observed that large dense areas think that the Central Valley or other less populated areas have an advantage, while the Central Valley or other less populated areas think it's the reverse.
115	Project Selection Criteria #1 - Page 24-25 - Application Guide	Kern County Public Hearing	But you can use median income for eligibility.	Correct.

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116	Project Selection Criteria #1 - Page 24-25 - Application Guide	Los Angeles Public Hearing	Definition of "useable park space"- request that we go into more detail- there are certain parks that might require membership fees like tennis courts and baseball fees. Will be closed to people who are not in leagues/not members. Need parks where people who are not members (general public) to be able to use the park.	Typically a park with a tennis court or baseball field also includes other features that are open to the general public. In this case a park exists in the community, while others may have no park at all. For purpose of this program, Project Selection Criteria #7 will ensure that daily entrance or membership fees will not prevent daily access to use the park (if funded by this program) by residents affected by poverty.
117	Project Selection Criteria #1 - Page 24-25 - Application Guide	Los Angeles Public Hearing	Definition of "park" excludes schools. Schools not considered as useable park space. Consider schools that have joint use - open during after school and on weekends. Joint use agreements between eligible applicants and schools are good.	No change. Schools are not counted as park space for Project Selection Criteria #1. But the creation of recreation features at schools, if open to the public during non school hours, can be an eligible project.
118	Project Selection Criteria #1 - Page 24-25 - Application Guide	Los Angeles County Area, Letter	There seems to be a big jump in the allocation of points between 3 acres (11 pts.) and 3.1 acres (5 pts.)--maybe explain the rationale behind these associations.	Change was made to Project Selection Criteria #1 scoring system. Instead of having a set point value based on acreage per 1,000, the revised guidelines will use a scoring

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119	Project Selection Criteria #1 - Page 24-25 - Application Guide	Los Angeles County Area, Letter	<p>½ mile radius starting at any boundary of the project site.</p> <p>Comment: The radius requirement for the determination of critical lack of park space should be decreased from ½ mile to ¼ mile. A basic premise of traditional neighborhood planning is that ¼ mile is a reasonable walking distance for the majority of people.</p>	Noted.
120	Project Selection Criteria #1 - Page 24-25 - Application Guide	Los Angeles Public Hearing	The "California State Parks Community Fact Finder" tool is a great idea - but critical that it becomes available by time of application.	Thank you. It will be available before the final guidelines are released, and you will have at least six months to find a project site that best meets the intent of the program and prepare your application.
121	Community Fact Finder Tool and Project Selection Criteria #1-2 Page 24-27 - Application	Monterey County Public Hearing	<p>I love the tool concept and want to say thank you. That part of the analysis was difficult (doing the work to obtain data). Being able to calculate median household income etc in proximity to project site is much needed. This can serve multiple purposes. Make as robust as possible in terms of available information (other data) so this can be used by other granting agencies.</p>	Thank you. We believe this will be a helpful form of technical assistance.

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122	Community Fact Finder Tool and Project Selection Criteria #1-2 Page 24-27 - Application guide	Monterey County Public Hearing	So "Community Fact Finder" tool allows applicant to start 1/2 mile radius at any boundary of project site. So using this tool, I can manipulate it (starting point) to where I can score most points. How about multiple points at project site- Because the apprehension I have is that you can take a large park with long fingers- and stick radius at that finger where you get a lot of people at that community, and not count much park land- compared to a square park where there is no finger. Eliminate as much manipulation as possible. For large parks, require 2 or 3 starting points (2 or 3 radii) at boundary that are not adjacent to each other.	No change. Allowing the radius to start at any boundary of an existing large regional park was a compromise so that they could draw upon a community within close proximity that has a low median income. If we were to require 2 or 3 radii, they could encompass higher income areas which would inflate the total median income, affecting the balance with criteria #2.
123	Community Fact Finder Tool and Project Selection Criteria #1-2 Page 24-27 -	Monterey County Public Hearing	Keep the project selection criteria for #1 and #2 the way you have it now - using the Community Fact Finder tool and ½ mile radius, but then have another question underneath such as - are there any circumstances where the park is removed from the population it serves - and those applications can have a subjective review to ensure that those applications are eligible.	No change. If the median income AND the acreage per 1,000 residents in proximity to the project site both do not meet the eligibility threshold, the project cannot be funded. If either the median income



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124	Community Fact Finder Tool and Project Selection Criteria #1-2 Page 24-27 - Application guide	Monterey County Public Hearing	There will be an agency such as a Boys and Girls Club with presence at the park where kids will take bus from their community to project. The kids don't live within ½ mile. Perhaps use a "or" – project is "in" the critically underserved community- or-will serve such a community. How about adding a criteria where we can say that project is regional and serving communities further than a ½ mile radius.	No change. Projects funded by this program can have a service area that covers an entire city, county, state, etc., while the key is that the project is in close proximity to a critically underserved community.
125	Project Selection Criteria #1-2 Page 24-27 - Application Guide	Monterey County Public Hearing	Applicant should show that they are indeed in close proximity to a disadvantaged community and make applicant prove it.	Correct. Project selection criteria #1-2 and the "Community Fact Finder" tool will ensure this.
126	Project Selection Criteria #1-2 Page 24-27 -	Stanislaus County Area, Letter	We support the 1/2 mile radius limit in determining the park acreage per 1,000 residents and median household income level found within proximity to the project site as this supports the intent of the legislation.	Noted.

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127	Project Selection Criteria #1-2 Page 24-27 - Application Guide	Bay Area - Oakland Public Hearing	<p>Make program similar to Murray-Hayden and the Urban Parks Act. The ½ mile radius for projects along East Bay shoreline is a problem.</p> <p>While AB 31 and Prop. 84 clearly give priority to new parks; we question why improvements to regional parks would not score as well, because regional parks provide broad services. We understand this program presents challenges. This part is so important due to eligibility- circle over-simplifies the community. Good projects may not be evaluated because it is a cookie-cutter. Suggest Prop. 40 approach where we could identify the community to be served.</p>	<p>The challenge is that this program gives higher funding priority to projects located in critically underserved communities with insufficient or no park acreage. We cannot use a system where there would be a project in an existing park, but none of the existing park's acreage would be counted. There would be a significant disconnect from meeting the higher priorities of the legislation if applicants could locate projects in a higher income or high park acreage community, while using data from a low income or low park acreage community not in proximity of the proposed project. Regarding the radius starting at a project site - If the radius were larger, it</p>

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				<p>would encompass higher income areas, or greater park acreage areas, which would disadvantage or disqualify applications that seek to create community green spaces in economically challenged neighborhoods. In other words, the median income or the park acreage would be inflated by nearby higher income or high park acreage communities.</p>
128	Project Selection Criteria #1-2 Page 24-27 - Application Guide	Bay Area - Oakland Public Hearing	<p>What if we use another shape, like a square mile or a rectangle? A lot of data is tied to census tract- use census tract.</p>	<p>The Community Fact Finder report will use census data drilled down to the block level based on 2008 projections. Please see the following response below regarding a similar census tract comment.</p>

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129	Project Selection Criteria #1-2 Page 24-27 - Application Guide	Bay Area - Oakland Public Hearing	Seems like you have small communities where ½ mile radius is too big. How about looking at one poverty census tract within the ½ mile radius? So you are serving one census tract within the ½ mile radius, and use that to look at eligibility etc.	The Community Fact Finder report will use census data drilled down to the block level based on 2008 projections. Using data from only one census tract would lead to these problems: Some census tracts in urban areas are small, while others in rural areas are large. This would lead to an inconsistent evaluation for Project Selection Criteria #1-2 throughout the state. As stated in a response above, the system must account for existing park acreage in cases where the project is in existing park land. In other words, it would be a disconnect if an applicant could use a census tract within the 1/2 mile radius, but not count any of the existing parkland at the proposed project site. This would ignore the fact that the community has existing parkland. On the other hand, if we would require

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				using the census tract of the project site itself, and the tract is very small, this could disqualify or disadvantage the project where the total community within the 1/2 mile radius may actually have a significant lack of park space.
130	Project Selection Criteria #1 Page 24-25 - Application Guide	Bay Area - Oakland Public Hearing	Our City meets the need criteria. Request that you look at density- we are one of the highest density areas -we are off the scale in terms of need when you look at park acreage/ratio- but when using the 1/2 mile it does not show that. 1/2 mile- we are so densely packed within 1/2 mile, but we have several parks with different uses- such as ball fields. Our city is one square mile. 1/2 mile- we are next to water- so where we put the project part of radius may cover water- and we are next to industrial area with no people. Issue of a trail- where to place the radius. Issue of need- you are using good criteria for need, but the issue I noted is a challenge (water, industrial area, and trail/linear park issue).	For a linear park or trail, an applicant may start the 1/2 mile radius at any boundary of the park/trail. Regarding the issue of having several parks within a 1/2 mile radius, a change was made to the scoring system for Project Selection Criteria #1, to allow competition to drive score for #1. See the new scoring scale for #1 in the new guide dated February 17th 2009.

**Comments and responses for Section IV  
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#	Topic	Venue	Comment	Response
131	Project Selection Criteria #1 Page 24-25 - Application Guide	Bay Area - Oakland Public Hearing	<p>Intent is to focus on communities with most need for park land- biggest need for park acreage. Is there a way to remove barriers to encourage more applications, but then through ranking process give more points to projects in communities with greatest need.</p> <p>Example- nature center next to water- provides environmental education to 3,000 kids-low income- each year. Meets a great need- but no one lives within a ½ mile radius.</p> <p>Other example- East Bay shore with water to west, people to east, and highway in middle may not meet eligibility criteria. But the park is a high priority for cities along the shore.</p> <p>I would like a slight reduction in points- tradeoff in points if we use a different starting point for “proximity”- to make us eligible.</p>	<p>The nature center project where no one lives within a 1/2 mile radius may be a better fit for the Prop. 84 Nature Education Facilities program. In the case of East Bay Shore, there are numerous communities within a 1/2 mile along the park having a median household income that can make the project eligible.</p>
132	Project Selection Criteria #1 Page 24-25 - Application Guide	Bay Area - Oakland Public Hearing	<p>A lot of our potential projects are in less developed parts along ocean. Many of our parks are for a regional audience. Granted that people who live within ½ mile may use it more, but our county has 700,000 people. We serve 21 cities.</p>	<p>Legislative priority is to place projects in critically underserved communities having insufficient or no park space.</p>

**Comments and responses for Section IV  
Project Selection Criteria # 1 and # 2, pages 24-27 of the December 1, 2008 Application Guide.**

#	Topic	Venue	Comment	Response
133	Project Selection Criteria #1 Page 24-25 - Application Guide	Bay Area - Oakland Public Hearing	Critical Lack of Park Space- Our County has a lot of State Park and national park land - many acres of undeveloped park acreage. But County needs sports facilities.	This is why only park space within the ½ mile radius will be counted, instead of the park acreage of an entire county. This enables applicants to place projects in critically underserved communities without being disadvantaged because the county as a whole may have high park acreage. And this program can fund sports facilities.
134	Project Selection Criteria #1 Page 24-25 - Application Guide	Bay Area - Oakland Public Hearing	We have a lot of pocket parks, but no swimming pools etc. Looking at only green space (park acreage) does not do it. Can we also look at the service area.	No change. There are many critically underserved communities throughout California with insufficient parkland.

**Comments and responses for Section IV  
Project Selection Criteria # 1 and # 2, pages 24-27 of the December 1, 2008 Application Guide.**

#	Topic	Venue	Comment	Response
135	Project Selection Criteria #1 Page 24-25 - Application Guide	Bay Area and Sacramento County Area, Letters	<p>Take into consideration the specific type of open space and amenities offered within the surrounding area of a proposed project. It is critical to see if the needs and desires of the surrounding community are met by what is currently offered.</p> <p>The City understands the concept for which the State is considering for this section, however in many cities and counties there may be open space in proximity of the proposed project, but that open space is under the jurisdiction of another entity that services an entirely different population. For example, within the proposed service area of a project there may be open space with hiking trails and a proposed application may not score well due to open space within its proximity. However, the impacted at risk youth, seniors, and core users within the service area do not utilize this existing recreational opportunity because it does not meet their specific wants or needs which then creates a void.</p>	<p>No change. Existing park space will count as existing park space. Legislative priority §5646 (a) is to place projects in critically underserved communities throughout California with insufficient parkland. Criteria #4 (Community Based Planning) is designed to ensure that the proposed project meets desires and needs of the community. Criteria #9 allows applicants to describe the need for the project and its benefits.</p>



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#	Topic	Venue	Comment	Response
136	Project Selection Criteria #1 Page 24-25 - Application Guide	Bay Area, Letter	<p>Since no block grant funding will be available and because this is one of the few park and recreation programs funded by Prop 84 it is important to insure that as many good projects as possible are eligible for the Statewide Park Development Program. I propose that projects that serve at least one underserved community within a half mile radius of the park be made eligible for the program. I believe this is consistent with AB31 which says for a project to be eligible, "The applicant demonstrates to the satisfaction of the department that the project is located in a critically underserved community, or in the case of a regional park or trail, the project is within close proximity to one or more critically underserved communities." In addition this methodology also allows the Department to fairly and objectively evaluate projects throughout the State. As an example our draft data analysis shows how the Tom Bates Sports Complex project serves and underserved community but as a regional facility is surrounded by water, a freeway and an industrial area which is not underserved as defined by AB 31. I believe that it would be fair, consistent with AB31 and in the best interest of the Department if the grant guidelines were written to include projects in close proximity one or more critically underserved communities such as the Tom Bates Sports Complex.</p>	<p>In the case of a regional park or trail, the applicant may locate the starting point of the 1/2 mile radius at any boundary of the park or trail. In the project example given in your comment, the potential starting point for the 1/2 mile radius can be located to capture a community with a median household income that makes the project eligible.</p>

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#	Topic	Venue	Comment	Response
137	Project Selection Criteria #1 Page 24-25 - Application Guide	Letter	Lack of park space is one of the two eligibility criteria (the other being household income) as stipulated by AB 31, to be able to apply for grant funding through the Statewide Park Development and Community Revitalization Program. The most important theme of the legislation was to bring park space to communities that demonstrate the greatest need and this criterion goes right to the heart of that sentiment. We believe the points available should reward this fundamental eligibility requirement and recommend that the maximum points available be raised to (20). We agree there should be a large drop-off in points awarded to projects with over 3 acres per 1,000 residents. The scale below is an example of how the adjusted scale could look: Points: 20 – From 0 to 1 acre per 1,000 residents 17 – From 1.1 to 2 acres per 1,000 residents 15 – From 2.1 to 3 acres per 1,000 residents 7 – From 3.1 to 4 acres per 1,000 residents 5 – From 4.1 to 5 acres per 1,000 residents 0 – More than 5 acres per 1,000 residents	Change made. Please see the new February 17, 2009, Application Guide- criteria #1 scoring system which allows the competition to drive the points instead of having set points for park acreage per 1,000 residents and median income. Number of points for this criteria is raised to 18.
138	Project Selection Criteria #1 Page 24-25 - Application Guide	Shasta County - Redding Public Hearing	Our density will be low. ½ mile radius- difficult for rural areas to score well.	Density is not a factor if there is not an existing park within the 1/2 mile radius.

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#	Topic	Venue	Comment	Response
139	Project Selection Criteria #1 Page 24-25 - Application Guide	Shasta County - Redding Public Hearing	If you don't care about density, it does not matter if there is 1 person, or 100 people, or 1,000.	Correct. If there is not an existing park within a 1/2 mile radius, the ratio of parkland per 1,000 residents will receive the same score for Criteria #1 whether there is 1, 100, 1,000, or 10,000 people within the 1/2 mile radius.
140	Project Selection Criteria #1 Page 24-25 - Application Guide	Shasta County - Redding Public Hearing	What if no one lives within the ½ mile radius? Only land available in rural areas may not be near houses. Guidelines should encourage applicants in those cases to submit a larger radius and explain why no one lives within ½ mile radius of project site. If you have few or no people within ½ mile, explain why project still benefits communities.	No change. This is a statewide grant program and there will be numerous proposed projects in both rural and urban areas where residential areas will be located within a 1/2 mile from the proposed projects.
141	Project Selection Criteria #1 Page 24-25 - Application Guide	Shasta County - Redding Public Hearing	Justification of need- should be able to argue why there is a need to place project at certain location rather than looking at ½ mile radius.	Legislative priority is to place projects in critically underserved communities with deficient or no parkland.
142	Project Selection Criteria #1 Page 24-25 - Application Guide	Shasta County - Redding Public Hearing	I understand the ½ mile radius which many use for neighborhood analysis. A ½ mile radius will make more applications eligible vs. using a larger radius.	Correct.

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#	Topic	Venue	Comment	Response
143	Project Selection Criteria #1 Page 24-25 - Application Guide	Shasta County - Redding Public Hearing	Connectivity to a bigger picture of other park areas should be looked at.	Legislative priority is to fund projects in communities with deficient or no parkland, which is what criteria #1 looks at. Project Selection Criteria #9 allows applicant to tell whole story, including project benefits.
144	Project Selection Criteria #1 Page 24-25 - Application Guide	Lake County Area, Letter	We recognize that there are no mandated splits for the funding between urban and rural areas and appreciate the chance to compete for funding on a statewide basis. Our primary concern with the program is the manner in which Proximity is defined in the grant documents. Proximity within the documents is defined as, "The area located within a half mile radius of the PROJECT site." It is our belief that this limited reach of Proximity will unintentionally favor urban locales. Being a small, rural municipality in northern California we are subsequently placed at a disadvantage for funding which could have a significant impact on the quality of our parks, and in turn the recreation opportunities afforded our residents. We feel that a more judicious interpretation of Proximity to mean the area within a one mile, or one and one half mile, radius would be more appropriate. This interpretation would serve to benefit all rural jurisdictions which historically have a more difficulty securing funding than the larger, better staffed, urban areas.	If the radius were larger, it would encompass higher income areas, or greater park acreage areas, which would disadvantage or disqualify many applications throughout the State. Through our comment period, we learned that there are potential "new park" projects in critically underserved rural areas without parks that may be quite competitive. On a side note, there are many small urban jurisdictions that are also inadequately staffed.

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#	Topic	Venue	Comment	Response
145	Project Selection Criteria #1-2 Page 24-27 - Application Guide	Shasta County - Redding Public Hearing	We want to get extra points if you meet both eligibility criteria. (lack of park space criteria #1 and low median income #2)	Change made to criteria #1 and #2 where the competition will drive the score range. We may receive numerous applications throughout the state where the community within proximity meets both eligibility criteria (#1 and #2).
146	Project Selection Criteria #1-2 Page 24-27 - Application Guide	Tulare County Area, Letter	State Parks is developing a mapping tool entitled "The Community Fact Finder" which purports to identify local park acreage that will be the basis for determining park and recreation land density for both eligibility and competitive scoring of grant applications. Local agencies will have little, if any, opportunity to review and comment on the accuracy of "The Community Fact Finder" during the current draft grant guideline comment period. Proposed revision:• Local agencies shall be provided a 45 day period upon the release of "The Community Fact Finder", during which time comments on the correctness of data derived from "The Community Fact Finder" can be provided to State Parks. Local agencies shall be entitled to challenge the correctness of data derived from "The Community Fact Finder" by providing information within the grant application related to parcels not directly under local agency control and use, as well as distinct lands not developed for park and recreation use. In evaluating grant applications, State Parks shall give	The Community Fact Finder tool will be available during the second public comment period. Public park and open space land within the 1/2 mile radius of the project site will be counted.

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#	Topic	Venue	Comment	Response
			consideration to such local agency provided information where it differs from data from "The Community Fact Finder".	
147	Project Selection Criteria #1-2 Page 24-27 - Application Guide	San Diego County Public Hearing	The California State Parks Community Fact Finder Tool - This is an excellent and innovative idea- where everyone can get and use the same information. Will be able to compare apples with apples. Issue where there is "green space", but it is not useable due to canyons/topography etc.	Correct. The tool will identify critically underserved communities that lack or have insufficient "green space".
148	Project Selection Criteria #1-2 Page 24-27 - Application Guide	San Diego County Area Public Hearing and Letter	Definition of "park"- for eligibility- It states that schools and community centers are excluded from definition. Clarify if a beach qualifies as a park- we feel it should not qualify for park acreage per 1,000. Our boundary is along beaches- we have a lot of beaches that are not useable-beach is within ½ mile but is not accessible-if you count beaches as parks, that will exclude many coastal communities. Many coastal communities also probably will not qualify under median income. Also, getting back to beaches- like T. Pines State Beach which is operated by State Parks, it is not our city's park. ½ mile radius may be bright line but too blunt due to issue above. Beaches are used by thousands of folks- we have community of 40,000 people but serve 2 million international visitors. Take into account all others who use the beaches.If beaches are counted, make an exception by taking into consideration ownership of the beach. If we don't own it, we should not have to count it. I understand goal and need for uniformity- but difficult	For criteria #1, only land designated as recreational open space land will be counted. Beach that is not officially recreational land open to the public will not be counted. Regarding the issue of ownership of public land available for recreational use, in terms of counting acreage, it does not matter if the applicant or another entity owns the land. The key is that the land is public recreational open space. No change based on the comments: The program's priority is to fund projects in critically underserved

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#	Topic	Venue	Comment	Response
			<p>because each city is different. We propose amending the last sentence of the “park” definition as follows: “Under this definition neither a school nor a beach is a park...” If beaches are counted for criteria #1, many coastal communities will be ineligible because the community residents can afford real estate close to the beach will likely not meet the median income/eligibility test. If it is determined that our proposed amendment to the definition of “park” should be rejected, we propose the following additions for consideration:</p> <ol style="list-style-type: none"> <li>1. Beaches shall not be considered to be a Park if not owned by the jurisdiction applying for grant funding.</li> <li>2. The total number of users of the beaches, rather than the residents within proximity, should be used for the park acreage ratio calculation.</li> <li>3. Beaches that may physically lie within one-half mile of the proposed project, but are not accessible with this distance because of natural or man-made barriers, shall not be included for purposes of determining the park-resident ratio.</li> </ol>	<p>communities with no or insufficient parkland.</p>
149	Project Selection Criteria #1 - Page 24-25 - Application Guide	San Diego Area, Letter	Communities with a severe lack of park space will be awarded more points: This is good. However, the definition of "useable park space" should take into account that a park may not be useable due to degradation of trails, trash or waste in park, security issues etc.	No change- Existing park space will be counted as existing park space.

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#	Topic	Venue	Comment	Response
150	Project Selection Criteria #1 - Page 24-25 - Application Guide	Auburn Area, Email	<p>First and foremost, of particular concern is the concept of a formula-driven service area. While I appreciate the fact that both Murray-Hayden and UPA had similar provisions, existing or proposed parks and the agencies that administer parks that are more regional in nature and draw from a larger demographic should be given greater latitude to determine a service area. An inflexible one-half mile service area also does not take into account physical barriers such as major thoroughfares and waterways that exclude areas of population. Also, such barriers mask the accessibility or inaccessibility of a given project to a user group. Nowhere in AB 31 nor in Proposition 84 are there provisions that require a ½ mile service area requirement and, again, I would encourage OGALS to consider providing applicants with greater latitude to determine service areas that enhance services for those in need who are within reasonable proximity to a proposed park or park improvement. At the very least I would respectfully ask that the reference to or the word “origin” of ½ mile radius be deleted and permit applicants to site the ½ miles radius anywhere within the project site.</p>	<p>The use of the ½ mile radius is two-fold. (1) Help steer applicants towards placing projects in areas that best meet the program's highest priority. That is, the creation of a new park where none currently exists in a critically underserved community with significant poverty. (2) Uniformly quantify the ratio of park space per 1,000 residents, and the poverty/household median income in proximity to projects, using consistent data available statewide. If the radius were larger, it would encompass higher income areas, or greater park acreage areas, which would disadvantage or disqualify applications. Regarding the idea of having applicants locate the origin of the 1/2 mile radius at another area that is not a boundary of the proposed project site: There would be a significant disconnect from meeting the higher priorities</p>



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#	Topic	Venue	Comment	Response
				<p>of the legislation if applicants could locate projects in a high park acreage community, while using data from a low park acreage community not in proximity of the proposed project. This method would overlook existing park acreage within proximity of the proposed project site, and would lead to the funding of projects in high park acreage communities.</p>
151	Project Selection Criteria #1 - Page 24-25 - Application Guide	Placer County Area, Letter	<p>While the drafted rating criteria puts a significant amount of weight on areas such as lack of park space, significant poverty, creating new parks, etc., we don't see no any mention of the agency/jurisdiction's ability to operate the facility into future. A newly constructed park that is not properly maintained will soon become a liability. The State should rate applications and give priority to projects based on the ability to complete the project in a timely manner and the ability to provide future maintenance and administration the improvement being funded.</p>	<p>Legislative intent gives a significant amount of weight on areas such as lack of park space, significant poverty, creating new parks, etc. Criteria #9 has been changed to look at applicant's experience. Please see the new February 17, 2009, Application Guide - criteria #9.</p>
	Project Selection Criteria #1 - Page 24-25	San Joaquin County Area, Letter	<p>Proposed projects on existing park land will be at a disadvantage as the ½ mile radius mechanism proposed in the guidelines will naturally capture existing parklands, undermining the competitiveness</p>	<p>Change made regarding the comment to condense the point spread: Please see the new February 17, 2009,</p>

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#	Topic	Venue	Comment	Response
	-Application Guide		of the project and skewing the true public benefit of the project. Condense the point spread.	Application Guide - criteria #1. The scoring system now allows the competition to drive the points instead of having set points for park acreage per 1,000 residents.
152	Project Selection Criteria #1 - Page 24-25 - Application Guide	Sacramento County Public Hearing	Our park is an island. There is nothing within a ½ mile of the island.	This project example may not be the best fit for this program.
153	Project Selection Criteria Page 24 - 25 - Application Guide	Sacramento County Public Hearing	We don't have anyone within a ½ mile. Is ½ mile definition of proximity throughout guide? Many communities are quite large. While a neighborhood park may attract people within a ½ mile radius, a \$5 mil project may benefit people further than ½ mile. Some projects may benefit people beyond a ½ mile.	A project that has no one within a 1/2 mile radius may not be the best fit for this program. However, if there is one resident, and no parks within a 1/2 mile radius, the ratio would be 0 acres of park space per 1,000 residents.
154	Project Selection Criteria #1 Page 24-25 - Application Guide	Sacramento County Public Hearing	Criteria seems rigid. The ½ mile proximity seems limiting. AB 31- communities that are underserved- Give additional consideration beyond 1/2 mile radius such as service area beyond. Give additional consideration- right now project gets 0 points.	Change made: Please see the new February 17, 2009, Application Guide - criteria #1 and #2 scoring system, which allows the competition to drive the points instead of having set points for park acreage per

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#	Topic	Venue	Comment	Response
				1,000 residents and median income. Projects funded by this program may also serve people who live further than a 1/2 mile, while the intent is to place projects in critically underserved communities.
155	Project Selection Criteria #1 Page 24-25 - Application Guide	Sacramento County Public Hearing	Support the ½ mile radius. AB 31 targets underserved communities. Access parks by foot. Residents of underserved communities need to be able to access a park by foot.	Noted.
156	Project Selection Criteria #1 Page 24-25 - Application Guide	Sacramento County Public Hearing	I have regional parks where that won't work. Perhaps we get more points if a ½ mile radius. But at least include everybody- such as regional.	It is true that a project in an existing regional park may not be as competitive under criteria #1 when compared as the creation of a new regional park where a park does not exist. However, a change was made to the scoring system for #1 so that the competition will drive the score.
157	Project Selection Criteria #1 Page 24-25 - Application	Sacramento County Public Hearing	I know that the creation of new park space is given priority. Criteria #1 15 points for lack of park space. Criteria #3 is 12 points. The new park could score 15 points in #1 and 12 in #3. But if an enhancement in an area with enough park space, it seems like those enhancements will not be competitive. If not adding	Change made to the scoring system for criteria #1 where the competition drives the score. There may not be many applications for new parks in critically

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#	Topic	Venue	Comment	Response
	Guide		new open space, I don't think those will fly.	underserved communities with insufficient or no park space.
158	Project Selection Criteria #1 Page 24-25 - Application Guide	Sacramento County Public Hearing	In past program, (Murray-Hayden Prop. 40), the radius had to touch the project site. (so the start of radius was not at the project site)	Correct. That system meant that none of the existing parkland (for projects in existing parks) was counted for the ratio of parkland per 1,000 residents. So a community with an abundance of parkland could potentially score equally to a community with no parkland. This program gives higher priority to funding projects in communities with insufficient or no park space, meaning some of the existing parkland must be counted when projects are located in existing parks.
159	Project Selection Criteria #1 Page 24-25 - Application Guide	Sacramento County Public Hearing	There are tourist areas like South Lake Tahoe- that are impacted in summer. For purpose of criteria, take into consideration the impacts from non-residents. (tourist seasons)	Project Selection Criteria #9 is designed to allow applicants to tell their story. Please see the new Application Guide dated February 17, 2009.

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#	Topic	Venue	Comment	Response
160	Project Selection Criteria #1-2 Page 24-27 - Application Guide	Greater Sacramento Area Letter	<p>Regarding Section IV, 1. Critical Lack of Park Space, the criteria is asking for total acreage of “usable park space”. The term “usable” is very ambiguous and not clearly defined in terms of what constitutes a park setting that is available for recreational use. Conceivably open spaced areas that may be viewed as “useable” park space, could be underutilized, blighted or deemed un-useable due to land use restrictions, lack of infrastructure, and accessibility issues in the area. (1). For example, in the case of South Lake Tahoe, a community priority project calls for the enhancement and improvement of existing campground space to parks and recreation use. In this instance, the campground serves no direct community recreational benefits and is merely designed for outdoor tourism accommodation units. Thus, to some, it is conceivable that the campground might be defined as “usable park space”, but in terms of serving the recreational needs of the local community, the term “usable park space” should not apply. Concerning the City of South Lake Tahoe taking into consideration the proposed ½ mile radius located at any boundary of the project site, would potentially put us ½ mile into Lake Tahoe, skewing the population data that we need to rely on to be competitive. Providing more flexibility in defining the radius of the project area would be helpful, allowing us to rely on local demographic need and data analysis which demonstrates that over 50% of our community is defined as low income.</p>	<p>Existing park acreage within the 1/2 mile radius will be counted. Legislation gives priority to projects located in critically underserved communities with no or insufficient park space. The median household income and families below poverty within a 1/2 mile radius will also be counted. Change made to criteria #1-2 to allow the competition to drive the score, instead of having set points based on park acreage per 1,000 residents and % of youth enrolled in the free/reduced price lunch program.</p>

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#	Topic	Venue	Comment	Response
161	Project Selection Criteria #1 Page 24-25 - Application Guide	Lake Tahoe Area, Letter	<p>1. Page 24 – The description of how to draw the .5-mile radius in the FAQ is so clear that maybe that language could be directly included in the application?</p> <p>2. Page 24 – How is Usable Park Space calculated for a Renovation Project? Does the project area count as existing Usable Park Space within Proximity of the Project Site? If so, it feels as though the project is “dinged” twice – once because it’s a renovation project in the first place (based upon the Type of Project), second because it essentially counts against itself because by definition the project site (or portions thereof) will count as usable park space within Proximity to the Project Site. Should Renovation projects have a different method of calculation?</p> <p>3. Page 24 – The definition of Usable Park Space and Park excludes general undeveloped public land or water quality treatment basins on public land? These lands have a primary purpose of protecting water quality or preventing development on environmentally sensitive land (not recreation).</p>	<p>1) Additional clarity added. Please see the new February 17, 2009, Application Guide. As a side note, the California State Parks Community Fact Finder” will show the .5 mile radius, and provides all relevant park acreage and demographic information of the community that falls within the radius.</p> <p>2) Existing park acreage that falls within Proximity of the project site will be counted. Please see technical assistance added to the new February 17, 2009, Application Guide, which provides additional clarity about how project types will be scored.</p> <p>3) Land that is not open to the public for public recreation use will not be counted by the California State Parks Community Fact Finder as park space for criteria #1.</p>

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#	Topic	Venue	Comment	Response
162	Project Selection Criteria #1 Page 24-25 - Application Guide	Sacramento County Public Hearing	<p>Definition of Proximity- Case of regional park- how do you address that issue? I don't know how much weight proximity is given. Contradicts a regional park compared to an urban park.</p> <p>If you are drawing from more than a half mile drive, does that draw away from the intent to fund the most severely underserved area? Some people drive 30 minutes plus to use park. If area of heavy snow fall, and cant use park for 6 months, does that count as park acreage. Take into account that in snowy areas you cant use park for 6 months (so don't count acreage)</p>	<p>Many youth, seniors, and families in critically underserved communities lack private transportation. A priority of this program is to place parks in those communities so the residents have daily access. We do anticipate receiving applications for new regional parks in rural or urban counties where there are some people who live within a 1/2 mile, and these projects may be quite competitive. Regarding the snow issue, California has diverse climates ranging from snow in mountains to heat in deserts, all which may affect seasonal park use. However, the system must count existing parkland. A change was made to Project Selection Criteria #1 to allow competition to drive score for #1.</p>

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#	Topic	Venue	Comment	Response
163	Project Selection Criteria #1 Page 24-25 - Application Guide	Sacramento County Public Hearing	I support the ½ mile radius. I feel strongly that the author’s intent is to serve the most underserved, especially children who can only walk and do not have the luxury of private transportation. Legislative hearings support this.	The 1/2 mile radius will help steer applicants towards locating projects in critically underserved communities. Otherwise, residents of such communities would have to travel to a park located outside of their community.
164	Project Selection Criteria #1-2 Page 24-27 - Application Guide	Sacramento County Area, Letter	The half-mile radius limit is appropriate for determining the park acreage per 1,000 criteria, and the median household income matches the intent of the legislation.	Noted.
165	Community Fact Finder Tool - Project Selection Criteria #1-2 Page 24-27 - Application Guide	Letter	TPL strongly suggests that the most recent, verifiable data be used when calculating elements in an application such as park acreage or household income. It is also imperative that the same data be used and available when accessing applicants so you are comparing ‘apples to apples.’ For example, the California Department of Finance has 2007 statistics reflecting California’s median household income. Clearly there is data available that is more recent than the 2000 census to reflect the shifting demographics in California - and that data should be used.	Apples will be compared to apples' through the Community Fact Finder which uses 2008 information.



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#	Topic	Venue	Comment	Response
166	Project Selection Criteria #2 Pages 26-27 Application Guide	Fresno County Public Hearing	Using free lunch is an excellent tool.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. The free lunch % of the nearest schools may not accurately reflect the community.
167	Project Selection Criteria #2 Pages 26-27 Application Guide	Fresno County Public Hearing	Our City concurs with using free lunch.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. The free lunch % of the nearest schools may not accurately reflect the community.
168	Project Selection Criteria #2 Pages 26-27 Application Guide	Fresno County Public Hearing	\$45,000 median income fits our whole town. I recognize problems with using free lunch as a measuring tool due to busing etc.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. .

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#	Topic	Venue	Comment	Response
169	Project Selection Criteria #2 - Page 26-27 - Application Guide	Fresno Public Hearing	Give consideration to low income populations beyond ½ mile radius for regional or State Parks.	There would be a significant disconnect from meeting the higher priorities of the legislation if applicants could locate projects in a higher income community or high park acreage community, while using data from a low income or low park acreage community not in close proximity of the proposed project.
170	Project Selection Criteria #2 Pages 26-27 Application Guide	Inland Empire Public Hearing	School attendance was my business- schools may have a magnet program- changes in demographics over the years- school boundaries have nothing to do with the neighborhood. (Do not use free/reduced price lunch %)	Free/reduced price lunch % of the nearest public elementary and middle school has been removed.
171	Project Selection Criteria #2 Pages 26-27 Application Guide	Inland Empire Area Email and Public Hearing	This criteria asks us to list the “nearest public elementary and middle schools to project site”. We request that this be changed to “a public elementary and middle school within Proximity of the project site.” Our project site is on the south side of Route 66, a high-traffic boulevard in our city. Such streets are often used as attendance boundaries for elementary schools because of the hazards they present for pedestrian crossing. Our “nearest” elementary school does not enroll as many students in the target population we intend to serve. However the oldest elementary and middle schools are in our	Free/reduced price lunch % of the nearest public elementary and middle school has been removed

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#	Topic	Venue	Comment	Response
			Proximity zone and would be much more appropriate choices.	
172	Project Selection Criteria #2 Pages 26-27 Application Guide	Inland Empire Public Hearing	Census tract we are looking at as \$48,000 median income- but schools have over 80% free/reduced price lunch. Can you have flexibility between the two.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Change made to the scoring system for #2 so the competition drives the score.
173	Project Selection Criteria #2 Pages 26-27 Application Guide	Inland Empire Public Hearing	Our city has no public schools- our kids go to neighboring city that has a higher income. (free lunch does not capture income of our communities)	Free/reduced price lunch % of the nearest public elementary and middle school has been removed.
174	Project Selection Criteria #2 Pages 26-27 Application Guide	Inland Empire Public Hearing	I think it works to use free/reduced lunch enrollment.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. The free lunch % of the nearest schools may not accurately reflect the community.
175	Project Selection Criteria #2 Pages 26-27 Application	Inland Empire Public Hearing	Use 2-B (median income as a scoring criteria, not just eligibility. Use both free lunch and median income as indicator for poverty. (make 2-B into a scoring scale)	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Change made to the scoring system for #2, by creating a

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#	Topic	Venue	Comment	Response
	Guide			median income scale where the competition drives the score.
176	Project Selection Criteria #2 Pages 26-27 Application Guide	Los Angeles Public Hearing	Bring other measures of poverty- the more that we can hit the better. More measures of poverty. Median income, plus schools etc. An area that hits all three should score higher than one or two poverty methods.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Change made to the scoring system for #2, by creating a median household income scale where the competition drives the score. Number of families below poverty will also be used.
177	Project Selection Criteria #2 Pages 26-27 Application Guide	Los Angeles Public Hearing	Part A- 2nd bullet- concerned about dividing the percentages by two. Does not capture # of students. School A. may have more students and a higher %. School B may have less students and a lower %.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed

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#	Topic	Venue	Comment	Response
178	Project Selection Criteria #2 Pages 26-27 Application Guide	Los Angeles Area - Letter	Significant Poverty The guideline's use of the percent of students enrolled in the federal free or reduced lunch program will not accurately reflect the community poverty status if the school enrolls students from outside the community. A more accurate measure would be using a percent of households with income as compared to the statewide area median income, for example: At least 50% of households have income at or less than 50% of the statewide area median income. 20 pts. At least 50% of households have income at or less than 60% of the statewide area median income. 15 pts. At least 50% of households have income at or less than 70% of the statewide area median income. 10 pts. At least 50% of households have income at or less than 80% of the statewide area median income. 5 pts.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Change made to the scoring system for #2, by creating a median household income scale where the competition drives the score. Number of families below poverty will also be used.
179	Project Selection Criteria #2 Pages 26-27 Application Guide	Monterey County Public Hearing	We are outskirts of community- next to very high poverty community with middle school and elementary over 90%.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed as it may not capture actual poverty of a community
180	Project Selection Criteria #2 Pages 26-27 Application Guide	Monterey County Public Hearing	We have 120 fore- closed homes in City - will Web tool take that into account.	No, but the web toll will use 2008 income projections.

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#	Topic	Venue	Comment	Response
	Project Selection Criteria #2 Pages 26-27 Application Guide	Bay Area - Letter	<p>1) Apply a cost of living adjustment to the median household income criteria. Several San Francisco neighborhoods that are clearly underserved have a median income level well above \$45,316 due to the high cost of living in our county. The threshold for poverty is significantly different for urban areas vs. rural areas. Using a standard measure for median income without taking in to consideration the cost of living puts urban neighborhoods – even those with significant homeless populations -- at a distinct disadvantage.</p> <p>2) In determining “Significant Poverty”, use the percentage of public school children living near the project site who are enrolled in federal free and reduced lunch programs, instead of considering the program participation rates for schools near the project sites. San Francisco Unified School District does not have a neighborhood school system; Children are bused to schools of their choosing throughout San Francisco. The children attending a school in a given neighborhood are not necessarily representative of the children who live there.</p> <p>3) Develop adjusted criteria for large scale redevelopment projects. San Francisco has two major redevelopment projects on former military land – Hunter’s Point Shipyard and Treasure Island – where the city is acquiring significant portions of land to build new neighborhoods, including significant new park space. It is unclear from this guide how the</p>	<p>1) Legislation directs us to use 80% of the statewide median household income as the eligibility threshold.</p> <p>Higher costs of living can be included as a “challenge” for residents in a community when responding to criteria #9.</p> <p>The number of families living below poverty has been added.</p> <p>2) Free/reduced price lunch % of the nearest public elementary and middle school has been removed.</p> <p>3) There are no points awarded for density as a stand-alone measure. The Community FactFinder tool will use 2008 data for criteria #1 and #2.</p>

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#	Topic	Venue	Comment	Response
			<p>eligibility criteria would be applied to these types of projects. Specifically, we ask that you account for planned development in determining density when considering redevelopment infill projects in urban areas. These planned communities will receive your highest density standard once they are complete. Due to the stage that these projects are in their development, however, they would likely receive zero points for density as the rules are currently defined in the application guide. There are few opportunities to acquire new park land in San Francisco. These two projects represent our best opportunities to create new parks in the City and we ask that you consider changing your criteria so that large redevelopment projects are not excluded.</p>	
181	Project Selection Criteria #2 Pages 26-27 Application Guide	Bay Area - Oakland Public Hearing	<p>Keep in mind not all schools are elementary/middle schools. What about k-8. Might have an impact. Would it be possible to use all elementary and middle schools in ½ mile radius. We have 3 within 1/2 mile of project site. Project may sit on border of other grade school. Nearest may be 4 blocks away and others 5 blocks away. Would be nice to take in average.</p>	Free/reduced price lunch % of the nearest public elementary and middle school has been removed
182	Project Selection Criteria #2 Pages 26-27 Application Guide	Bay Area - Oakland Public Hearing	<p>Look at who lives by project - rather than nearest school. Children at nearest school don't come to project site, because they are from a different community. Students that use site are bussed to a different school that is not the closest, but they live by the project site. District issue and freeway issue.</p>	Free/reduced price lunch % of the nearest public elementary and middle school has been removed Change made to scoring system for poverty: where the competition drives the

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#	Topic	Venue	Comment	Response
				score based on median income and number of families below poverty.
183	Project Selection Criteria #2 Pages 26-27 Application Guide	Bay Area - Letter	Suggest that the scoring threshold for significant poverty is expanded to include the threshold of 80 percent up through 100 percent receiving the full amount of points. Communities that are negatively impacted by poverty and whose youth are enrolled in the free or reduced lunch program need and deserve the best amenities offered, and differentiating between 80 percent up to 90 percent as currently written may inadvertently harm the communities we are trying to support and those most in need.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed Change made to scoring system for poverty: where the competition drives the score based on median income and number of families below poverty.
184	Project Selection Criteria #2 Pages 26-27 Application Guide	Bay Area - Letter	I would like to request a clarification to Guideline 2.B., which requires that for eligible projects: The household income of census tracts in PROXIMITY to the PROJECT was lower than \$45,315 based on the "California State Parks Community Fact Finder" report. Does this mean that any census tract that is touched by the ½ mile radius circle must be included in the calculation? The City of Berkeley would support this interpretation. The City would not support cutting up the census tract to only that portion that lies within the circle. Can you provide clarification on this methodology? Also, because the California State Parks Community Fact Finder is not yet available for review, we request that the Public Comment period be extended until potential applicants have at least one week to review	The median household income from the "California State Parks Community Fact Finder" report will be based on block level, which are sub-units of census tracts, that are within the ½ mile radius of the project site. The block level portions which fall within the 1/2 mile radius will be counted. The Community Fact Finder tool will be available for review during this additional comment period.



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#	Topic	Venue	Comment	Response
			the Fact Finder program and data.	
185	Project Selection Criteria #2 Pages 26-27 Application Guide	Shasta County - Redding Public Hearing	U.S. Census – poverty based on overall population. Criteria #2 is based on free-lunch. If you have no children in area (home school, charter school) no public schools or kids, it does not work. Middle school/Elementary has a 52.3 % free lunch enrollment. But we are 67% of the median income for State. We have less than \$30,000 median income.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Change made to the scoring system for #2, by creating a median income scale where the competition drives the score.
186	Project Selection Criteria #2 Pages 26-27 Application Guide	Shasta County - Redding Public Hearing	A lot of people don't apply for free lunches- matter of pride. Don't want to be known as needing help. Won't get true rep of families' income based on free-lunch.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. The free lunch % of the nearest schools may not accurately reflect the community.
187	Project Selection Criteria #2 Pages 26-27 Application Guide	Shasta County - Redding Public Hearing	Urban and rural- big difference in trying to serve people. Obviously urban areas have more people with density where people need to be served. In future program should be geared to urban, and other to rural.	The legislation for this program requires statewide competition.

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#	Topic	Venue	Comment	Response
188	Project Selection Criteria #2 Pages 26-27 Application Guide	Shasta County - Redding Public Hearing	The Roberti-Z'berg-Harris (need basis/competitive) program was broken down by urban and nonurban.	The legislation for this program requires statewide competition.
189	Project Selection Criteria #2 Pages 26-27 Application Guide	Shasta County - Redding Public Hearing	Over last 20 years, this free lunch criteria has been successfully used.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. The free lunch % of the nearest schools may not accurately reflect the community.
190	Project Selection Criteria #2 Pages 26-27 Application Guide	Shasta County - Redding Public Hearing	Have an either-or. Use free lunch, or use census data such as median income.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Change made to the scoring system for #2, by creating a median income scale where the competition drives the score.
191	Project Selection Criteria #2 Pages 26-27 Application Guide	Shasta County - Redding Public Hearing	In economic woes, these programs (such as free lunch- may lose funding.)	Free/reduced price lunch % of the nearest public elementary and middle school has been removed.

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#	Topic	Venue	Comment	Response
192	Project Selection Criteria #2 Pages 26-27 Application Guide	Shasta County - Redding Public Hearing	In urban and rural areas, lunch programs % may not correlate with poverty.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Change made to the scoring system for #2, by creating a median income scale where the competition drives the score.
193	Project Selection Criteria #2 Pages 26-27 Application Guide	San Marcos Area, Letter	<p>The percentage of youth enrolled in the federal free and reduced price lunch program should be revised to be the percentage of youth eligible to receive free and reduced price lunch program. This is a better indicator of the economic condition. Also, the point scale using the percentage of youth enrolled is too high. Other funding programs using this methodology to determine the economic condition use far less percentages.</p> <p>The guidelines currently state that only the nearest elementary school and middle school be calculated within the percentage of youth enrolled within the federal free and reduced price lunch program. The guidelines should be revised to include all elementary and middle schools within proximity of the project and take the average of those percentages. This should be revised because the proposed project will serve the needs of not only the nearest schools but those schools within proximity of the project.</p> <p>This section should reduce the number of points assigned to the free and reduced price lunch program from 15 points to 10 points. The remaining 5 points</p>	<p>Change made: Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Scoring system for criteria #2 will use a median household income scale where the competition drives the score.</p> <p>Regarding the last comment about accessibility- accessibility is an eligibility requirement, which gives it weight. Projects that lack adequate accessibility will not be awarded a grant.</p>

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#	Topic	Venue	Comment	Response
			<p>should be assigned to Project Accessibility section on page 37 because projects that provide accessibility for youth, seniors and families should receive more weight beyond the 5 points currently assigned.</p>	
194	Project Selection Criteria #2 Pages 26-27 Application Guide	San Diego Area, Letter	<p>Park or project within a 1/2 mile of the park poor or low-income community: The preference for parks in low income communities will allow for the allocation of funds to areas often ignored by other grant programs. This is a great guideline to allow the most in need to be considered.</p>	Noted.

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#	Topic	Venue	Comment	Response
195	Project Selection Criteria #2 Pages 26-27 Application Guide	San Diego County Public Hearing	We prefer looking at poverty, instead of school lunch %. Children who go to school may be outside ½ mile - may not live in the ½ mile. Focus on income level of community within the 1/2 mile of project site instead of % of free lunch at school.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Change made to the scoring system for #2, by creating a median income scale where the competition drives the score.
196	Project Selection Criteria #2 Pages 26-27 Application Guide	San Diego County Public Hearing	I concur. % of free lunch may be skewed due to kids being bused in/outside of the ½ mile radius.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. The free lunch % of the nearest schools may not accurately reflect the community.
197	Project Selection Criteria #2 Pages 26-27 Application Guide	San Diego County, Letter	An alternative to the Federal Lunch program percentage could be the percentage of the park service area residents at or below median household income level.	Change made to the scoring system for criteria #2, by creating a median income scale (based on the community within the 1/2 mile radius) where competition drives the score. The Community Fact Finder Report will use 2008 data.

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#	Topic	Venue	Comment	Response
198	Project Selection Criteria #2 Pages 26-27 Application Guide	Letter	<p>Socio-economic status in the community is the other fundamental eligibility requirement for access to grants from this program and we again believe the maximum points available reflect this priority and should be raised to (20). AB 31 instructs that the eligibility be based on median household income, specifically 80% or below of the statewide average. The Application Guide however awards points for significant poverty based on percentage of youth enrolled in the free and reduced-price lunch program – this could be problematic.</p> <p>For example, in the cities of San Francisco and Berkeley, schoolchildren are assigned to schools based on a lottery system as opposed to proximity to their homes. As a result, significant populations of children attend schools outside the potential service area for projects under this program. Obviously this could skew the percentage of youth enrolled in lunch programs and render that statistic useless as a reflection of poverty in a given community.</p> <p>Unless you are accounting for the youth enrolled in the lunch program based on their residential address as opposed to where they go to school, we ask that you consider the points awarded for ‘Significant Poverty’ be based on median household income for the project service area and be designed in a sliding scale from 0-20 points. We believe median household income over 80% of the statewide average be awarded 0 points.</p> <p>A sliding scale for this section could look like this: Points: 20 points for 50% or less of median HH</p>	<p>Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Change made to the scoring system for criteria #2, by creating a median household income scale (based on the community within the 1/2 mile radius) where the competition drives the score.</p>

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#	Topic	Venue	Comment	Response
			<p>income            15 points for 51% to 60% of median HH income            10 points for 61% to 70% of median HH income            5 points for 71% to 80% of median HH income            0 points if greater than median HH income</p>	
	<p>Project Selection Criteria #2 Pages 26-27 Application Guide</p>	<p>Sacramento County Area, Letter</p>	<p>The .5 mile radius is restrictive and inadvertently negatively impacts regional facilities. There are many institutions and regional facilities throughout the State that need to upgrade and enhance their existing open space and park facilities, while also offering outdoor educational opportunities that attract users farther than .5 miles away. Guideline should offer more flexibility and wider discretion that will better enable funding to meet the needs of communities on a case by case basis.</p>	<p>The use of the ½ mile radius is two-fold. (1) Help steer applicants towards placing projects in areas that best meet the highest priority of the legislation. That is, the creation of a new park where none currently exists in area with significant poverty. (2) Uniformly quantify the ratio of park space per 1,000 residents, and the poverty/household median income in proximity to projects, using consistent data available statewide. If the radius were larger, it would encompass higher income areas, or greater park acreage areas, which would disadvantage or disqualify many applications statewide.</p>

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#	Topic	Venue	Comment	Response
199	Project Selection Criteria #2 Pages 26-27 Application Guide	Lake Tahoe Area Letter	Using the percentage of Federal free and reduced lunch as a determining demographic factor can be uncertain. This number can vary greatly in an area like ours with a large transient school population. Lake Tahoe Unified School District officials believe this number to be inaccurate in regards to the number of students who would qualify based on family income, in comparison to the amount of forms that are turned in. We believe this is due to family pride, fear, and/or a misunderstanding of what the document is used for. The information loaded into the "California State Parks Community Fact Finder" could be outdated in a largely transient community such as ours, and we would much prefer to use current local data analysis to enable us to meet the needs of children in our economically challenged neighborhoods.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Change made to the scoring system for criteria #2, by creating a median income scale (based on the community within the 1/2 mile radius) where competition drives the score. The Community Fact Finder Report will use 2008 data.
200	Project Selection Criteria #2 Pages 26-27 Application Guide	Sacramento County Public Hearing	Concerned about lunch program. Might penalize small cities. Project is by low income housing- all of the kids on free lunch program- but the school % is diluted by affluent part of town. In larger cities you will have entire areas of poverty.	Free/reduced price lunch % of the nearest public elementary and middle school has been removed. Change made to the scoring system for #2, by creating a median income scale (based on the community within the 1/2 mile radius) where the competition drives the score.