By: Ariana Hernandez
Client: The Wilderness Society
Faculty Advisor: Greg Pierce

A comprehensive project submitted in partial satisfaction of the requirements for the degree
Master of Urban & Regional Planning

Disclaimer: This report was prepared in partial fulfillment of the requirements for the Master in Urban and Regional Planning degree in the Department of Urban Planning at the University of California, Los Angeles. It was prepared at the direction of the Department and of The Wilderness Society as a planning client. The views expressed herein are those of the authors and not necessarily those of the Department, the UCLA Luskin School of Public Affairs, UCLA as a whole, or the client.
Acknowledgments

First, I extend gratitude to Kitty Craig and Yvette Lopez Ledesma at the Wilderness Society. Thank you for taking on this project and guiding me through this process. I look forward to working with you both and the Wilderness Society in the future to continue working towards park equity!

Thank you, Luskin Center for Innovation for your support throughout this project. I especially want to thank Colleen Callahan for your support in this project and your support throughout my Master’s Program. Additionally, I want to thank Sarah Perez for your work as an undergraduate researcher.

Thank you to my faculty advisor, Greg Pierce. Thank you for your guidance and mentorship for not only this project but my personal development as a student and a researcher.

Silvia Gonzalez, thank you for being my additional advisor and mentor. I appreciate the time you took to answer all my questions and guide me through the data.

To all the interviewees for this report, thank you for your time and careful consideration in your interviews. I admire all of your passion and dedication towards moving park equity forward.

Julie Waterman, thank you for helping us get this project started, sharing your vast knowledge on the ORLP program, and all your and the City Parks Alliance’s work advancing equitable, urban parks.

Lastly, thank you to my friends, family, and MURP peers! To my sister, Amaya, I am forever grateful we were able to go to school together again and enjoyed learning alongside you. To my parents and brother, Anthony, thank you for your continuous support throughout every stage of my educational journey. To my partner, Jimmy, thank you for patience and grace as I finished my capstone and my degree. To my peers, I could not have finished this capstone or degree without your comradery, your assistance, and most importantly your humor.
Table of Contents

Executive Summary........................................................................................................ 5
Introduction.................................................................................................................. 7
Context Overview......................................................................................................... 8
Methodologies............................................................................................................... 15
Findings....................................................................................................................... 18
Recommendations......................................................................................................... 31
Appendix....................................................................................................................... 40
Citations....................................................................................................................... 47
Executive Summary

In 2014, Congress established the Outdoor Recreation Legacy Partnership (ORLP) Program as a way to prioritize urban, park-poor, and economically disadvantaged communities. The ORLP program is the only federal grant program that specifically supports new or improved outdoor recreation opportunities in urban communities. The National Park Service (NPS) administers the program through the states to award funding to underserved urban communities.

The ORLP Program is at a pivotal moment as the Biden-Harris administration commits to target 40% of federal climate investments to go directly to frontline communities most affected by poverty and pollution through the Justice40 initiative (Callahan et al. 2021). The administration’s commitment to investing in disadvantaged communities provides a unique opportunity to evaluate the ORLP program to determine what are the challenges and opportunities to improve the program for future applicants.

Given this research opportunity, the research questions are defined as: Is the federal ORLP program accomplishing its intended goals to promote outdoor recreation access to economically disadvantaged areas? What are potential barriers that prevent urban areas from better utilizing ORLP funding? While a full-scale program evaluation was not feasible given time and resource restrictions, the research project advanced the task of evaluating the program through a qualitative assessment of stakeholder perspectives and a quantitative assessment of the socioeconomic characteristics and “park-shed” analysis of the urban areas which NPS invited to submit a final ORLP application.*

The mixed methods approach exposed a number of findings relevant to the research questions. The stakeholder interviews revealed what was working with the ORLP program, the challenges in all stages of the ORLP process, and potential recommendations. Most stakeholders appreciated that the ORLP program is focused funds for parks in urban, underserved communities. However, many stakeholders stated that there were challenges with the application timelines, the application materials, and broad barriers that underserved communities face when applying to competitive, federal grants. The quantitative analysis revealed the characteristics of the communities that have ORLP projects. Based on these findings, the ORLP program is generally allocating funds to communities that have historically been underserved in terms of access to parks from a socioeconomic standpoint, but when looking at the number of existing parks within a ten-minute walk of ORLP projects, the ORLP program varies in allocating funding to

*NPS invites ORLP applicants to submit final applications after an initial technical and merit review process. For here forward, this report will refer to these projects as “ORLP projects.” However, it should be noted that not all projects that are invited to submit a final application will receive ORLP funding. These processes will be further covered throughout the report.
“park-poor” communities.

Given the preliminary findings, this report recommends:

1. The National Park Service (NPS) should create more feasible and clearer project parameters when releasing the Notice of Funding Opportunity (NOFO) as well as create more consistent and predictable application timelines.

2. NPS, the State Liaison Agencies, and local governments should create a park needs assessment to target ORLP funds to park-poor communities.

3. NPS should increase technical assistance capacity for ORLP applicants and State Liaison Agencies after the NOFO is initially released as well as throughout the life cycle of the grant period.

4. NPS should increase and promote more transparent communication between the State Liaison Agencies and the ORLP applicants at all stages of the ORLP process.

5. NPS and park equity advocates should conduct further research on how to improve the ORLP program and the LWCF State and Local Assistance Program more broadly.
Introduction

In 2014, Congress established the Outdoor Recreation Legacy Partnership (ORLP) Program funded by the Land and Water Conservation Fund (LWCF) as a nationally competitive grant program that delivers funding for new or improved outdoor recreation to urban areas with at least 50,000 people, prioritizing projects located in economically disadvantaged and park-poor areas (NPS 2020). At the time of this research, the program invited over 60 projects to submit a final application nationwide, distributing $44 million in federal funding to more than 50 communities for projects ranging from remediating brownfields into waterfront parks to developing parkland intended to focus on healthy foods.

While the ORLP program has funded important projects across the country, it has only been partially successful in distributing funding, leaving on average 20% of funds intended to improve park equity unspent in the first four grant cycles. With increased appropriations expected for this program, the program is positioned to be an increasingly important source of federal funding for underserved, urban communities. Understanding barriers to the program’s success and identifying potential solutions will help inform future reform efforts that advocates and the administration can advance to ultimately deliver on the promise of the ORLP program. Given this situation, there is a unique opportunity to better clarify the program’s implementation and administration to better shape the trajectory of future ORLP projects and urban outdoor recreational spaces across the United States. This research project attempts to answer the following questions:

- Is the federal ORLP program accomplishing its intended goals to promote outdoor recreation access to economically-disadvantaged areas?
- What are potential barriers that prevent urban areas from better utilizing ORLP funding?

The project utilizes a mixed-methods approach of qualitative and quantitative methods to answer the research questions. The project is completed in partnership with the Wilderness Society (TWS) to further TWS’s park equity advocacy efforts by identifying potential solutions to barriers to ensure more equitable access to outdoor recreation for disadvantaged urban communities across the country.

First, the qualitative aspect of the research includes 22 semi-structured interviews with key stakeholders, including:

- Staff at the National Park Service
- State agencies like California Department of Parks and Recreation, Washington Recreation and Conservation office, and New Jersey Department of Environmental Protection, and
- Local agencies like Las Cruces Parks and Recreation and the City

* This report reviews the first four ORLP grant awards. On 5/6/2022, NPS released the fifth grant cycle (Fiscal Year 2021). NPS invited 27 projects to submit a final ORLP application. Please see the latest grant announcement for further details: https://www.doi.gov/pressreleases/secretary-haaland-announces-61-million-increase-outdoor-access-urban-spaces
of Seattle’s Parks and Recreation Office.
The interviews yielded detailed experiences of relevant stakeholders and created a description without using statistical techniques. The interviews focused on three main focal points of ORLP: (1) general experience administering, applying for, and receiving ORLP grants; (2) equity in ORLP administration and implementation; and (3) funding approaches and barriers.

The quantitative analysis included generating spatial and descriptive statistics using Census data and the Trust for Public Land’s ParkServe data to determine if the ORLP program is connecting underserved populations to outdoor recreation opportunities and improving the distributional equity of parks in the United States. This was done by generating the socioeconomic characteristics of the communities which NPS invited to submit a final ORLP application at the census tract level to measures of economically disadvantaged and underserved, as described in the Methodologies section, and by calculating the number of parks that the ORLP projects are within a ten-minute walk of to determine park-poverty status and potential park need of the community. The proposed research attempts to identify potential solutions to barriers and recommendations to ensure more equitable access to outdoor recreation for disadvantaged urban communities across the country.

The structure of the rest of the report is as follows: (1) a context overview, which details a literature review of park equity and environmental policy evaluation techniques; (2) methodologies, which provides a description of the data methods used to answer the research questions; (3) the findings from the research study, which analyzes the data from the interviews and spatial analysis; and (4) the recommendations, which presents 5 suggestions for the ORLP process specifically, future ORLP applicants, and general park equity considerations.

Context Overview

**Background on LWCF and ORLP**

Congress created the LWCF State and Local Assistance Program to ensure that present and future generations have sufficient access to outdoor recreational opportunities. The LWCF State and Local Assistance Program accomplishes this goal by authorizing and providing grants to states to support local outdoor recreation opportunities. The National Park Service (NPS) operates the LWCF State and Local Assistance Program in partnership with designated lead agencies from all 50 states and territories. Congress allocates money from the LWCF to the State and Local Assistance Program which is then allocated to the states based on a legislative formula. To be eligible for LWCF grants, states must maintain an approved Statewide Comprehensive Outdoor Recreation Plan (SCORP), which must be updated at least once every five years. Among other things, SCORPs are used to assess the supply and demand for outdoor recreation resources and set priorities for the use of LWCF funds. In 2014,
Congress first appropriated a portion of the State and Local funds to be used for the ORLP program. Unlike the State and Local Assistance Program, money is not allocated to the states based on a legislative formula and instead is a competitive grant program and not everyone who is eligible and applies is guaranteed funds.

The goal of the ORLP program is to provide new or significantly improved recreational opportunities for economically disadvantaged communities in urban areas* that are underserved** in terms of parks and other outdoor recreation resources. The project area must be located on publicly owned land and must be preserved in perpetuity. The competition prioritizes projects that serve underserved communities in terms of parks and outdoor recreation areas, serve economically disadvantaged communities, create short-term and/or permanent jobs, stimulate local economic development, engage and empower members of the affected community, create or expand public-private partnerships, benefit from multi-level stakeholder coordination, improve recreational opportunities for all, and advance the goals set forth in the state’s SCORP (NPS 2020).*** ORLP projects are typically classified as acquisition, development, or renovation projects (NPS 2020).

As environmental justice and park equity comes to the forefront of decision makers’ minds, especially given the benefits of outdoor spaces amidst the COVID-19 pandemic, ORLP presents a unique opportunity for urban areas that are “park-poor” to address the unequal spatial distribution of outdoor recreation opportunities in the United States. Congress has increasingly awarded the ORLP program more funding each grant cycle indicating this program is widely supported. A Department of Interior press release shows the importance of the ORLP program to the Biden-Harris Administration’s commitment to environmental justice:

“Every child in America deserves to have a safe and nearby place to experience the great outdoors. The Outdoor Recreation Legacy Partnership program is a crucial tool to advancing environmental justice and ensuring equitable access to nature and its benefits. Working together with state and local governments to ensure green spaces promotes the health and welfare of urban communities.”

---

* As designated by the Census Bureau
** Each grant cycle the Notice of Funding Opportunity (NOFO) has changed the definition for underserved. The current definition of underserved from the 2021 NOFO: “underserved communities” are those with: (1) no existing parks; (2) some existing parks but not enough to support the size of the population of the service area or otherwise able to satisfy existing recreational demand; or (3) some existing parks (potentially even an adequate number of parks) that are so deteriorated/obsolete or underdeveloped that a major redevelopment or rehabilitation is necessary to significantly increase the number of people or user groups who could be served in a way that would be equivalent to a new park.

*** For more information on the SCORP, please see: https://www.nps.gov/subjects/lwcf/planningprojects.htm
Background on Parks Research

The benefits of urban parks have been well documented, including but not limited to increased well-being, decreased mortality, increased economic activity and job creation, and increased aesthetic value (Wolch et al. 2014). This section of the report explores park equity literature to evaluate recommendations to alleviate park-poverty and examines environmental policy analysis to determine how the federal and state governments can better administer the ORLP program in underserved communities. There is a plethora of literature on advocacy planning and planning in marginalized communities, however, there are few practical methods that practicing park planners can utilize to better address inequities in park-poverty (Sister et al. 2010). This research looked further at barriers that stakeholders face in the ORLP process and how to successfully implement the ORLP program so that ORLP funding can reach its intended audience of “underserved communities.”

Previous park equity research predominantly focuses on the creation of inequities on a sub-national scale and the disparities in benefits. The federal ORLP program has nationally been hailed as a success in providing funding to aid park-poor communities, but few studies have been done to determine if national level programs have been successful in distributing funds to underserved communities (Eldridge et al. 2019).

Disparities in Park Service

Research has shown that outdoor spaces not only increase physical wellness but also mental well-being (Godbey 2009). Outdoor spaces increase physical activity, “decrease likelihood of overeating and suffering pollution related health problems,” reduce stress, reduce childhood obesity and attention deficit symptoms in children, among other benefits (Godbey 2009, p. 3). As cities become more densely populated, urban green spaces and outdoor recreation become more important. The importance of parks became especially prevalent during the COVID-19 pandemic, when urban residents used parks and outdoor spaces to gather with friends and family, exercise, and practice mental wellness (Larson et al. 2021). Urban parks perform multiple services and hold various roles for urban dwellers, especially during times of crisis like urban heat events and the COVID-19 pandemic.

However, studies have shown that urban parks are predominantly located in white, high-income neighborhoods, leaving low-income communities of color “park-poor” (Byrne et al. 2009; Wolch et al. 2014). Often, when economically disadvantaged communities do have access to outdoor recreational space, municipalities lack financial resources to optimally maintain and operate outdoor programs which promote use, rendering the space under-utilized or obsolete (Wolch et al. 2014). An Urban Institute report also found that parks in communities of color were smaller and
had less green infrastructure, resulting in less environmental benefits and overcrowding (Eldridge et al. 2019). This overcrowding finding contrasts Wolch et al.’s findings in communities of color’s parks being underutilized; however, both findings confirm that urban parks in communities of color are typically inadequate.

Scholars have previously characterized “park-poverty” as part of broader inequality in property development, racialized oppression, and systemic exclusion in park planning (Wolch et al. 2014). While traditional environmental justice literature has focused on the siting of environmental burdens, like toxic facilities, other scholars have argued that the exclusion of environmental benefits, like parks, equally contributes to environmental injustices (Sister et al. 2010).

Many factors contribute to park-poverty and often reinforce one another (Wolch et al. 2014). Increasing urbanization has reduced available green spaces, discriminatory housing practices pushed communities of color to neighborhoods where the city or county does not provide park services, and low-income, smaller communities do not have adequate funding to operate and maintain parks so that they are fully utilized by community members (Wolch et al. 2014). Previous literature has shown that discriminatory housing practices, like redlining, has a lasting legacy where these neighborhoods experience more environmental burdens, like park-poverty, and disparate health outcomes due to limited public investment in amenities and opportunities (Choi et al. 2020; Eldridge et al. 2019). These factors create disparities in use and benefits, leaving low-income communities of color without adequate access to parks. Inadequate access to parks has also been described as parks that are not inclusive to all cultures and perceived unsafe (Eldridge et al. 2019). Therefore, accessible parks should be “designed and programmed to meet community needs” so that they are properly utilized and accessible for all community residents - a requirement that often can be met through meaningful community participation and community buy-in (Eldridge et al. 2019, p. 6).

Outdoor recreation areas not only increase physical and mental health, but also can address environmental burdens by creating green spaces which can filter air, mitigate storm-water runoff and flooding, and reduce temperatures in urban areas. Low-income communities of color often do not have adequate park space along with other environmental services, such as clean air, safe and affordable drinking water, and suffer from effects of urban heat island, creating a cumulative burden that further perpetuates inequalities (Eldridge et al. 2019). A Trust for Public Land report found that “areas within a ten-minute walk of a park are as much as six degrees cooler than areas beyond that range” (TPL 2020). The size of parks is also important in reaping environmental benefits, as the Trust for Public Land (TPL) found that parks that are larger and have denser green spaces receive more cooling and air filtration benefits than smaller, more crowded parks that are often found in low-income communities of color (TPL 2020). Leveraging park’s multi-benefits like air filtration,
creation of active transportation for bikers and pedestrians, cooling urban heat, and managing stormwater can also present more opportunities for funding through various state and federal grants (Eldridge et al. 2019). Scholars and policymakers have also documented outdoor recreation opportunities in economic development and job creation through a green economy (Sausser et al. 2019). Parks address many disparities found in underserved communities such as environmental services and economic development.

Yet, creating urban parks poses a “green paradox” (Wolch et al. 2014). By creating urban parks and environmental services, it can “improve attractiveness and public health, making neighborhoods more desirable” (Wolch et al. 2014, p. 235). This in turn can raise housing prices and price low-income residents out of their existing neighborhoods, leading them to move to more undesirable neighborhoods with similar environmental burdens (Wolch et al. 2014). This phenomenon is known as “green gentrification,” defined in the Urban Institute’s “Investing in Equitable Urban Park Systems” as “the process whereby funding additional and improved greening activities can transform neighborhoods in ways that raise property values and quality-of-life measures” (Eldridge et al. 2019, p. 6). Thus, creating urban parks, without anti-displacement measures, can result in further harm to underserved communities and reinforce a system of inequity. In Alessandro Rigolon and Jon Christensen’s “Greening without Gentrification: Learning from Parks-Related Anti-Displacement Strategies Nationwide” key recommendations include implementing anti-displacement strategies at the same time that park planning begins to go “hand-in-hand in an integrated planning process” that involves park equity and housing equity stakeholders (Rigolon and Christensen 2019, p. 4).

Another key recommendation from this report is to provide meaningful engagement with the community so that they can “educate local governments” about the challenges in park planning and green gentrification (Rigolon and Christensen 2019, p. 4). The Policy Prevention Institute (PPI) provides a “Theory of Change” framework to ensure equitable park planning is provided (PPI nd). PPI outlines that community involvement must go beyond a public hearing and empower community members to lead efforts in park planning within their communities to create long-term solutions that do not create further harm (PPI nd.). By having community member’s meaningful input in the park planning process, parks can be better suited for the “needs and desires of existing residents” (Eldridge et al. 2019, p. 6). Furthermore, it is necessary to continuously evaluate park planning and policies, like the federal ORLP program, to ensure that providing parks and other environmental services is benefiting the communities that are in greatest need and not further perpetuating disparities.
Evaluating Environmental Policies

Previous literature has identified pitfalls and successes in environmental policies that aim to address existing inequities. In the UCLA Luskin Center for Innovation’s “Making Justice 40 a Reality for Frontline Communities” the authors outline initiatives to combat climate change in underserved communities to better the federal Justice 40 initiative, which targets 40% of the benefits of climate and clean infrastructure investments to “disadvantaged communities” (Callahan et al. 2021). The authors evaluate existing climate initiatives strengths and weaknesses that can then be applied to the Justice 40 initiative. One key criticism of the California Climate Initiative that the authors outline which is applicable to the ORLP program is that “competitive grant-reliant programs depend on recipients being proactive” (Callahan et al. 2021, p. 63). Underserved communities often do not have the resources or staff to begin applying to competitive grant programs let alone operate and maintain the programs after initial construction (Callahan et al. 2021). The authors suggest that competitive grant programs should “actively disseminate information about program opportunities and make resources available to support households and communities in taking advantage of them” (Callahan et al. 2021, p. 64). To better direct funding towards “underserved communities,” park planners must ensure that program operators provide technical and financial assistance in the application process to “bridge the resource and expertise gap to facilitate participation”; otherwise, communities without the knowledge necessary to apply to these programs will continue to be excluded from the park planning process (Callahan et al. 2021 p. 64). Callahan et al. also outline the strength in requiring a minimum number of funds to be allocated to “priority populations” (Callahan et al. 2021, p. 55). By setting a price floor rather than an aspirational price ceiling, funding is ensured for “priority populations” (Callahan et al. 2021, p. 55). This also allows direct benefits to be allocated to communities with the most need rather than letting funding go elsewhere.

An emerging criticism of environmental policies at the state and federal level is the ambiguity in language. Critics state that ambiguity, specifically in looking at population parameters, leads to funding gaps and underutilized policies. Ian Davies et al.’s “Assessing the flow to low-income urban areas of conservation and environmental funds approved by California’s Proposition 84” outlines the importance of clear language in allocating funds to where they are intended to go (Davies et al. 2019). The authors found that stricter language around “underserved park-poor or low-income communities” resulted in more funding being allocated to these communities whereas more vague language resulted in funds going to communities with “no significant difference in income from unfunded areas” (Davies et al. 2019, p. 10). By defining the communities in which programs intend to serve they are easier to identify and invest in (Callahan et al. 2021). Callahan et al. outline five definitions to identify “disadvantaged
communities and low-income communities” shown below:

- Communities with disproportionately high cumulative levels of pollution exposure and associated health impacts
- Communities with disproportionately high risk of climate change impacts
- Communities of color and low-income communities with fewer government resources, community capacity, and political power
- Working class households disproportionately impacted by the transition from fossil fuels and to a clean, equitable economy
- Low-wealth households that historically have benefited the least from clean technologies and other environmental investments (Callahan et al. 2021, p. 50).

According to a PPI report, programs must create specific guidelines and frameworks to target funds to the “highest need communities” (Aboelata et al. 2022). These metrics must be clearly defined as well as created using best available research (Aboelata et al. 2022). An example of one metric can be found in California’s Assembly Bill 3. This Assembly Bill defines park-poverty as “less than three acres of usable parkland per 1,000 residents” (AB 31 2008). By creating clear definitions, funding and assistance can be better utilized by communities who would otherwise be unable to leverage funding. Clear definitions and parameters will also help potential grant applicants in identifying which grants they qualify for and have a likely chance of being awarded.

Summary

The federal ORLP aims to address park-poverty through a competitive grant that targets urban, economically disadvantaged, and underserved communities. I attempt to answer whether the ORLP program is reaching underserved communities, potential barriers to receiving funding, and how these barriers can be overcome. Previous research has documented the ways in which park-poverty is created and the effects of lack of accessible green space on human health and the environment. This distribution of park benefits is often disparate and impacts low income communities of color, along with other cumulative environmental impacts. Previous research acknowledges that common policy failures include:

- Lack of technical assistance in competitive grant programs which leaves underserved communities unable to begin the application process,
- Unclear definitions of the intended population that policy aims to serve leading to funds going elsewhere, and
- Programs utilizing funding floors rather than ceilings and thereby not specifically allocating funding to their intended populations.

The ORLP program has potential to better address these inequities, however, the ORLP program is not being utilized to its fullest potential, in that every year there has been a funding surplus. In the fourth funding cycle, the National Park Service appropriated $16 million out of $40 million.
Methodologies

Research questions

1. Is the federal Outdoor Recreation Legacy Partnership (ORLP) Program accomplishing its intended goals to promote outdoor recreation access to economically disadvantaged areas?

2. What are potential barriers to funding that prevent urban areas from better utilizing the ORLP program and how can they be overcome?

Research approach

To answer my research questions, I used a mixed-methods approach using qualitative and quantitative steps. I did not determine causality, instead I conducted descriptive research to provide a picture of how the current federal ORLP program is administered at the national and state level and barriers to apply to the program at the state and urban area level.

Phase 1: Stakeholder Interviews

The qualitative aspect of the research includes semi-structured interviews with key stakeholders that could create a more holistic picture of the ORLP process at all stages for future stakeholders and to advance The Wilderness Society’s park equity advocacy priorities. Interviews focused on four general themes: (1) experience administering, applying, or implementing the ORLP program; (2) perceptions of the strengths and weaknesses of the ORLP program; (3) experience administering, applying, or implementing with other park equity programs; and (4) potential solutions to improving the ORLP program moving forward.

I conducted interviews with National Park Service (NPS) staff to better understand the ORLP evaluation process and qualities staff looks for in ORLP applications to better inform future applications. I conducted interviews with state officials who administer the LWCF program* to understand why some states are successful in obtaining funding for various ORLP funding rounds, why some states are unsuccessful in obtaining funds from ORLP, and the associated barriers with the ORLP program. I conducted interviews with ORLP awardees to understand the qualities of projects that receive funding from ORLP, the environmental and cultural review process for ORLP selected projects, and barriers to applying.

I identified stakeholders through The Wilderness Society’s network and through the snowball sampling technique. I used the snowball sampling method and not the random sampling method because of the limited timeframe that the capstone project allows. When selecting interviewees for the State Liaison Officers (SLOs) and previous ORLP applicants, I attempted to invite stakeholders that are geographically diverse and vary in success with ORLP project awards. I invited stakeholders from the West coast, Mountain region, East coast, Southern region, and Midwestern region, to ensure that there was a diversity in experiences due to potential regional

* The State officials which administer LWCF programs are known as State Liaison Officers (SLOs) and work for State Liaison Agencies.
Phase 2: Quantitative Analysis

I interviewed 28 stakeholders during January - April 2022. I invited 26 interview participants from 12 different states of which 22 accepted and many interview participants invited relevant coworkers to the interview. Each interview ranged between one hour to two hours and was audio recorded per the permission of the interviewee. Appendix B provides a list of stakeholders interviewed. I recruited most interview participants by contacting them directly via email. I used the snowballing method to further recruit stakeholders to interview by sending a follow-up email to the interviewed stakeholders to ask if they had contacts they thought would be relevant to this research project. I conducted interviews online on a variety of platforms, depending on interviewee preference including via Zoom, Microsoft Teams, and Google Meet depending on the interviewees preference. I wrote field notes during the interview and transcribed the interview afterwards. After each interview, I followed up with the interviewees to determine which level of confidentiality they preferred for the report:

1. Completely anonymous with only summarized information and no attribution in the entirety of the report;
2. Summarized, anonymized information in the body of the report with an attribution at the end of the report with your affiliated organization; or
3. Direct citations or attributed information in the body of the report with an attribution at the end of the report with your affiliated organization.

Generally, most interviewees preferred the second option of confidentiality. However, some indicated they preferred the third option of confidentiality and are therefore not attributed in the report.

To analyze the interview data, I read and coded the transcript and wrote a thematic analysis, pulling the key points from each interview. Kitty Craig (TWS), followed a similar process so that we could compare thematic points and determine which were noteworthy. In the Findings section, I included the summarized, anonymized thematic topics and supplemented this information with secondary data to explain my findings.

Phase 2: Quantitative Analysis

The quantitative analysis includes descriptive statistical and spatial analysis to better understand the socioeconomic characteristics of the census tracts which have ORLP projects and to understand if these areas are park-poor as the ORLP program intends. I relied on census tract data from the U.S. Census Bureau and the Trust for Public Land’s Ten-Minute Walk calculator to determine if the ORLP program is fulfilling its intended purpose of providing parks to park-poor and economically disadvantaged communities.

I used the 2019 American Community Survey (ACS) 5-Year Estimates to collect descriptive data census tracts
with ORLP projects. I utilized the following ACS tables:

- **A00001**: Total Population
- **A04001**: Hispanic or Latino by Race
- **A13003B**: Poverty Status in 2019 for Population 18-64
- **A12001**: Educational Attainment for Population 25 Years and Over
- **C16001**: Language Spoken At Home For The Population 5 Years And Over

I chose to use census tract level information because NPS uses local parameters that the ORLP applicants present in their applications to determine whether or not a community is economically disadvantaged or has been historically underserved in terms of green infrastructure like parks. I collected the latitude and longitude points for the 66 ORLP projects in the first four grant cycles, then spatially joined this data to their corresponding Census tracts to determine whether their “park-shed” is underserved or economically disadvantaged in terms of parks. It should be noted that the latitude and longitude points are for projects that NPS selected for the pre-application process. Out of the 66 projects, nine have been determined illegible after the pre-application process or have declined the ORLP grant due to a variety of factors discussed in the findings section. However, I still used the initial ORLP projects that NPS invited to submit a final application to determine if

---

* NPS does not use pre-determined metrics to determine “economically disadvantaged” or “park-poverty” but instead relies on the narrative aspects of the ORLP project applications.

** Please see Appendix C. for the list of ORLP projects in the first four grant cycles.

*** Please Appendix D. for the list of ORLP projects that did not reach a grant agreement.

---

To create the parameters for defining underserved populations, I drew from a variety of sources, including: the Council of Environmental Equity’s Climate and Economic Justice Screening Tool (BETA) (CEE 2022), the Trust for Public Land’s ParkServe tool (TPL 2022), CalEnviroScreen (OEHHA 2022) and national averages according to the 2019 ACS 5-year estimates. Based on the mentioned tools, I determined that a community is vulnerable to being “park-poor” or have been historically underserved in terms of park planning processes if they are:

- Within a majority non-white census tract (over 50% nonwhite),
- 10% or more of the population in the census tract’s highest educational attainment is less than high school (CEE 2022),
- 15% or more of the census tract’s population is living below the federal poverty level (ACS 2019), or
- 15% or more of the census tract lives in limited English speaking households (OEHHA 2022).

I provide the descriptive statistics for each grant cycle in the Findings section. I did not create an overall score of “underservice” for the census tracts with ORLP projects. NPS strongly emphasizes communities living in poverty as underserved communities, but NPS also relies on the project narrative for communities to justify why they are
underserved in terms of various demographic characteristics, community needs, and environmental burden.

In addition to the socioeconomic information obtained from the Census, I also utilized the Trust for Public Land’s Ten-Minute Walk service area calculator. The Trust for Public Land (TPL) created the ParkServe database, which includes park information for nearly 14,000 cities, towns, and communities (TPL 2021). TPL utilized the U.S. Census 2010 Places geospatial dataset and associated population estimates to obtain boundaries for the cities, towns, and communities. TPL attempted to contact each city, town, and community with a request for their parks data and supplemented missing information from available resources, such as park information from municipal websites, GIS data available from counties and states, and satellite imagery (TPL 2021). For each park, TPL created a ten-minute walkable service area using a nationwide walkable road network dataset provided by Esri (Environmental Systems Research Institute). The analysis identifies physical barriers such as highways, train tracks, and rivers without bridges, and chooses routes without barriers.

I spatially joined the latitude and longitude points of the ORLP projects to the TPL’s Ten-Minute Walk service area calculator to determine if the ORLP projects are located within a ten-minute walk of an existing park and/or how many parks are within a ten-minute walk of the ORLP project. NPS states that “‘underserved communities’ are those with: (1) no existing parks; (2) some existing parks but not enough to support the size of the population of the service area or otherwise able to satisfy existing recreational demand; or (3) some existing parks (potentially even an adequate number of parks) that are so deteriorated/obsolete or underdeveloped that a major redevelopment or rehabilitation is necessary to significantly increase the number of people or user groups who could be served in a way that would be equivalent to a new park” (NPS 2020). Because I am unable to measure the quality of the parks, I relied on the quantity of the parks within a ten-minute walking distance to determine if the ORLP projects are within an underserved community in terms of access to parks.

**Findings**

**Interview Findings**

The first research question is:

*What are potential barriers to funding that prevent urban areas from better utilizing the ORLP program?*

Through the stakeholder interviews, this report discovered many opportunities and challenges in the ORLP application and funding allocation process. The interviewees expressed that the focus on urban areas and higher grant limits are some components that are working well. Whereas, some challenges the interviewees expressed were the matching grant component, staff capacity, the ORLP timeline, and others. The interviews shed light on seven key challenges and opportunities, sum-
### Positive Aspects of the ORLP program
- Dedicated funding to urban, underserved areas
- Increased grant appropriations
- Ability to use ORLP funding for renovation projects
- Increased communication with NPS as the program has matured

### Unpredictable ORLP Application Process
- Long and unclear application process.
- Unpredictable two-phase application process

### Pre-existing Capacity to Examine Equity
- States that previously prioritized equity had greater success in obtaining ORLP funding in comparison to states that have not created equity tools.

### Limited Staff Capacity to Solicit and Implement ORLP Projects
- Inadequate staff to solicit quality ORLP applications, provide technical assistance, and follow the requirements set forth by the Land and Water Conservation Fund Act (Vincent 2019).

### Inconsistent ORLP Timeline
- The timeline from when NPS released the NOFO to the initial application submission was too quick to turn in quality applications.
- The timeline after stakeholders submitted their applications was too long and inconsistent and posed challenges for moving the project forward.

### Matching Grant Requirements
- Many urban areas found it challenging to provide a 1:1 match.

### Changing Requirements to the Notice of Funding Opportunity (NOFO)
- Changing application parameters from grant cycle to grant cycle made it difficult to submit quality applications.

### Breakdowns in Communication
- The two-phase chain of communication with NPS proved to be challenging for both ORLP applicants and State Liaison Agencies.

---

**Table 1. Interview Findings**
Positive Aspects

First, most interviewees expressed gratitude for the dedicated funding source for urban areas. Many interviewees expressed that urban projects are expensive due to the cost of land and construction so having the ORLP program as an available federal funding source was especially useful in their park planning processes.

Because the cost of land is more expensive and scarce in urban areas many interviewees expressed that funding acquisition projects proved challenging. Therefore, the interviewees appreciated being able to use the ORLP funding towards renovation projects for existing parks. This is also represented in that 27 of the 66 ORLP funded projects in the first four rounds are renovation projects.

Additionally, the ORLP program has received larger appropriations each grant cycle. As depicted in Table 2, in the first grant cycle (fiscal year 2014) Congress appropriated $3,000,000 towards ORLP funding whereas in the fourth grant cycle (fiscal year 2019) Congress appropriated $20,000,000 towards ORLP funding.* With larger appropriations, more ORLP projects are able to be funded and interviewees indicated that they appreciated the monetary support for urban, underserved park projects.

Lastly, many stakeholders indicated that communication with NPS had been a challenge especially for the earlier ORLP grant rounds. However, in the most recent grant rounds, NPS hired a full-time staff person to communicate with the states and provide feedback on their applications. With the dedicated full-time staff person, many interviewees stated there was noticeable improvement in communication with NPS and felt they received more detailed and timely responses on questions related to the ORLP program and their applications.

* In the last grant cycle (Fiscal Year 2021), Congress appropriated $125,000,000 to the ORLP program, showing increased monetary support for the ORLP program.

Unpredictable ORLP Application Process

One of my first findings is related to understanding the ORLP process and timeline. Figure 1 summarizes the multiple steps applicants and grantees must take during a typical ORLP application. A more detailed process is described in Appendix A. Program administrators indicated they felt the ORLP process was inconsistent and unpredictable from grant cycle to grant cycle and that led to the greatest challenges in the application, implementation, and allocation of funds. However, it should be noted that the ORLP process does not have an exact timeline...
<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>Amount NPS Awarded</th>
<th>Amount Appropriated</th>
<th>Cumulative Funds Available to NPS</th>
<th>Unspent appropriation for FY (%</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY 2014</td>
<td>$2,631,833</td>
<td>$3,000,000</td>
<td>$3,000,000</td>
<td>12.3%</td>
<td>7</td>
</tr>
<tr>
<td>FY 2015</td>
<td>$-3,000,000</td>
<td>$3,368,167</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>FY 2016</td>
<td>$13,381,153</td>
<td>$12,000,000</td>
<td>$15,368,167</td>
<td>10.8%</td>
<td>22</td>
</tr>
<tr>
<td>FY 2017</td>
<td>$11,697,715</td>
<td>$12,000,000</td>
<td>$13,987,014</td>
<td>2.5%</td>
<td>18</td>
</tr>
<tr>
<td>FY 2018</td>
<td>$-20,000,000</td>
<td>$22,289,299</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>FY 2019</td>
<td>$16,887,300</td>
<td>$20,000,000</td>
<td>$42,289,299</td>
<td>57.8%</td>
<td>19</td>
</tr>
<tr>
<td>FY 2016-19</td>
<td>Average</td>
<td></td>
<td></td>
<td></td>
<td>16.5</td>
</tr>
<tr>
<td>Total</td>
<td>$44,598,001</td>
<td>$70,000,000</td>
<td>$25,075,487</td>
<td></td>
<td>66</td>
</tr>
</tbody>
</table>

*For Fiscal Years 2016 and 2018, NPS did not administer the ORLP Grant Cycle.

**Unspent appropriated funds "roll over" to the next fiscal year.

Table 2. ORLP Appropriated Funds
Figure 1. ORLP Application Process

Notice of Funding Opportunity

State Project Competition

State Pre-Application Submittal to NPS National Competition

NPS Eligibility Review

Technical Review Period

Merit Review Panel

National Ranking and Certification by NPS Director

State Notification and Final Application Preparation

Final NPS Review

Grant Agreement
States that had strong LWCF Liaison Agencies generally have produced strong ORLP applications. States that prioritize funding towards park and equity, were unsurprisingly more successful in conducting technical outreach and assistance to potential applicants. Many of these State agencies have existing park needs assessments or environmental justice tools that the ORLP applicants could utilize to strengthen their application. These agencies also assist the applicants in the environmental and cultural review processes. Whereas, states that had not prioritized parks or outdoor recreation or had less robust natural resource agency infrastructure were limited in staff and resources to properly solicit ORLP applications and provide technical support.

Generally, the states that successfully obtained ORLP funding have already selected metrics to determine which communities can be categorized as underserved. For example, California uses their Community Fact Finder tool (California State Parks 2020) and obtained six ORLP grants in the first four grant cycles and New Jersey uses their Statewide Overburdened Communities Map (NJDEP 2022) and obtained four ORLP grants in the first

---

**Pre-existing capacity to examine equity**

States that had strong LWCF Liaison Agencies generally have produced strong ORLP applications. States that prioritize funding towards park and equity, were unsurprisingly more successful in conducting technical outreach and assistance to potential applicants. Many of these State agencies have existing park needs assessments or environmental justice tools that the ORLP applicants could utilize to strengthen their application. These agencies also assist the applicants in the environmental and cultural review processes. Whereas, states that had not prioritized parks or outdoor recreation or had less robust natural resource agency infrastructure were limited in staff and resources to properly solicit ORLP applications and provide technical support.

Generally, the states that successfully obtained ORLP funding have already selected metrics to determine which communities can be categorized as underserved. For example, California uses their Community Fact Finder tool (California State Parks 2020) and obtained six ORLP grants in the first four grant cycles and New Jersey uses their Statewide Overburdened Communities Map (NJDEP 2022) and obtained four ORLP grants in the first

---

*The amount of time it takes NPS to review the proposals and announce selected projects is variable to change from grant cycle to grant cycle. At this time, there is no estimated duration for the ORLP application steps.*
four grant cycles. The State Liaison Agencies and potential ORLP applicants then target vulnerable communities and are able to create a narrative as to why they are eligible for ORLP funds using their predetermined metrics. Many successful State Liaison Agencies have determined potential outdoor recreation and park projects through a Parks Master Plan, the SCORP, or other planning documents. These projects typically have a grant match, community support, and have conducted some level of environmental or cultural review. These projects with strong State Liaison Agencies, coupled with applicants that have access to more staff resources and have well-planned projects are better equipped to apply to ORLP funds.

Additionally, these State Liaison Agencies are timely communicators and have preexisting relationships with local municipalities. The State Liaison Agencies, in some cases, also regularly communicated with NPS to determine which projects may be eligible for ORLP funding so that they only submit projects which will be likely selected. The more involved a State Liaison Agency, the better ORLP applicants from that state are positioned to receive ORLP funds.

Limited Staff Capacity to solicit and implement ORLP projects

The ORLP process can be time intensive for state and local agencies. Without adequate staffing at the State Liaison Agency, the state cannot adequately solicit project applications and review any eligible projects. Many successful State Liaison agencies that were interviewed indicated they had over three staff people dedicated to LWCF applications, like the ORLP program. Whereas, State Liaison Agencies that indicated ORLP is challenging to apply to had one person dedicated to LWCF applications amongst other obligations. Local cities without full-time grant writing staff also face barriers to applying to ORLP funds. The ORLP process is a competitive grant cycle so without full-time staff dedicated to submitting quality park applicants, it is a barrier to underserved/economically disadvantaged jurisdictions that lack this staff capacity. Many State Liaison Agencies also indicated that the competitive, complex nature of the grant deterred some urban areas from applying. These urban areas felt that ORLP is a grant-writing competition that they were not equipped to or commit limited staff resources. However, we found in our interviews that many (not all) smaller urban areas have grant-writing capacity. Nevertheless, many of these smaller, under-resourced urban areas do not have the ability to take on a grant as large and competitive as ORLP, which is generally recognized as a complex federal grant.

An additional challenge that the stakeholder interviews addressed was staff capacity limitations in maintaining the ORLP project in perpetuity. Under the LWCF Act, LWCF funded projects “must be preserved for outdoor recreation uses in perpetuity and cannot be converted to any use other than public outdoor recreation use without the written approval of the Secretary of the Interior” (NPS 2021). This posed a problem to many interviewees in that they do not have the
Inconsistent ORLP Timeline

Interviewees identified challenges in both the pre-application and post-application timelines. Many State Liaison Agency expressed that in the pre-application grant cycle NPS gave them three to four months to submit a high-quality application. An additional barrier is that many interviewees state that the application window has historically overlapped with a “busy season” for local agency’s park program during the summer months. The interviewees expressed that this was not a sufficient amount of time to read and understand the NOFO (because it changes each cycle), conduct outreach to eligible communities, provide technical assistance to potential applicants, conduct site visits, and then submit the project to NPS. Many SLOs indicated that they solicit projects during this short timeframe only by using an email listserv. They are unable to conduct robust technical assistance and community outreach to the communities that are most in need due to the limited timeframe in which the NOFO is released to the initial application deadline. Many of the projects that are submitted in the pre-application phase have already been identified by the community and have well-functioning local parks and recreation agencies. Urban areas with low-functioning parks and recreation agencies, typically are unable to apply because they do not have adequate time or funding to begin the ORLP application process.

In terms of the post-application timeline, unlike the quick turnaround in the initial submittal, State Liaison Agencies and ORLP applicants expressed a challenge with the inconsistency with which NPS responded to their applications. Often NPS takes months past their deadlines to get back to project applicants whether or not they have received funding. Many interviewees stated this was especially challenging because they had to provide a 50% match at the beginning of the application and had to hold onto that match for an unforeseen amount of time. The State Liaison Agencies stated that often NPS would take too long in getting back to the applicants, that the applicants lost their match and had to forfeit the ORLP award. It is especially difficult for economically disadvantaged communities to hold a 50% match for an unforeseen amount.

of time, as priorities can quickly change and the community may need to use the money elsewhere. Many interviewees indicated that this was also challenging in that they create a budget and come up with a match for the pre-application, but because of the long timeline in NPS reaching a grant agreement, the applicant’s budget becomes outdated and the project’s expenses exceed the budget due to inflation or shifts in production and construction costs. This was especially difficult for projects that involved land acquisition. Many found it challenging to reach agreements to acquire the land without having a guaranteed match in place and therefore ORLP applicants opted for development or renovation projects instead. An unforeseen complication for many applicants was due to COVID-19 and supply chain disruptions, the cost of construction and materials shortages exceeding their budget amount and created a challenge.

**Matching Grant Requirements**

ORLP, due to the LWCF Act, requires a 50% match in non-federal funding sources. This means that NPS will award funding for half of the project expenses and the project applicant will match that grant with state, local, and private grants and other eligible match sources. Project applications must provide proof of the other 50% of funding when applying for ORLP funds. From the latest NOFO released, the goal of ORLP is to “provide new or significantly improve recreation opportunities for economically disadvantaged communities in larger urbanized areas.” Many interviewees identified the 50% match as one of the most significant barriers for economically disadvantaged communities. The interviewees discussed that it was challenging for an economically disadvantaged community to gather enough funding to develop a new or significantly improved outdoor recreation project in an urban area. The funds are more likely to go to communities that know how to obtain large amounts of funding and/or can be nimble with sources of match funding. Communities that are economically disadvantaged or have never applied to grants this size are at a disadvantage because of the match requirement and competitive nature of the grant. However, the 50% match requirement is written in the LWCF Act and it would take an act of Congress to update this language.

**Changing Requirements to the Notice of Funding Opportunity (NOFO)**

The ORLP program has gone through five grant cycles since 2014. Every year the NOFO changes slightly and the eligibility requirements for ORLP funds change. The State Liaison Agencies often need to quickly adapt to the new changes in the NOFO to ensure they submit eligible and high-quality projects to NPS. With changing guidelines each grant cycle, State Liaison Agencies have to spend...
Many ORLP applicants expressed that because they must apply through their State’s Open Selection Process they do not communicate directly with NPS regarding their application. This is sometimes beneficial to applicants that have strong State Liaison Agencies, because these agencies are well equipped to apply to the ORLP program and have timely communication with the applicants. However, some ORLP applicants found it difficult to not have a direct line of communication with NPS as they were not aware of the status of their project at any given time. Additionally, because the ORLP applicants do not communicate directly with NPS, some interviewees expressed that the project complexities and challenges can be difficult to communicate through second-person communication via SLOs.

The State Liaison Agencies also found it challenging in communicating with NPS due to NPS staff capacity. Often, communication was delayed and could hold up the project from beginning construction. Interviewees indicated that corresponding with NPS after they had been invited to submit a final application or reached a grant agreement was challenging because NPS asked for the same materials multiple times or did not respond to the applicants in a timely manner. Additionally, many interviewees indicated that they felt there was unclear or no communication regarding their applications when NPS rejected their application. Interviewees often felt they had strong applications but received no feedback or little feedback regarding why NPS rejected their application. However, NPS has stated that feedback on rejected applications is available upon request and is the responsibility of the State Liaison Agency. Interviewees also expressed confusion and a lack of clarity around the technical and merit review panel processes.

Despite these challenges, many interviewees indicated that communication with NPS has significantly improved after the agency hired a dedicated staff person for the ORLP program.
Historically, communities of color have not had access to quality green spaces due to discriminatory housing practices, disinvestment in communities of color, or other discriminatory housing practices (Byrne et al. 2009; Wolch et al. 2014; Eldridge et al. 2019). The ORLP does not specifically address race or ethnicity, but does address “underserved” broadly in terms of access to quality park space. Across the first four grant cycles, as depicted in Table 3, the census tracts with ORLP projects are majority non-white census tracts (68.5%) and in all the grant cycles the census tracts are majority non-white (over 50%).

Next, this report investigated the highest level of educational attainment by looking at the percent of the population 25 years and older who have obtained less than a high school degree. Using the methodology developed by the Council of Environmental Quality for the Climate and Economic Justice Screening Tool (BETA), this report determined that census tracts with over 10% of the population 25 years and older who have obtained less than a high school degree are vulnerable to being underserved in terms of environmental amenities and would benefit from green job development as the ORLP program emphasizes (CEE 2022). For ORLP projects in the first four grant cycles, the census tract average for populations over 25 years and older who have not obtained a high school degree is 22.7%. As detailed in Table 3, the census tracts that have ORLP projects range from 15.5% to 27.9% of the population 25 years and older who have obtained less than a high school degree.

NPS emphasizes that ORLP funding should be allocated to economically disadvantaged communities and uses the federal poverty level as a means of measuring economically disadvantaged. In 2019, 12.6% of the U.S. population lived in poverty according to the American Community Survey. Based on the U.S. average and prevailing parks literature, this report determined that census tracts with 15% or more of their population living in poverty are vulnerable to being underserved in terms of environmental amenities. On average the population within the census tracts with ORLP projects are living in poverty. All rounds except for the first round have over 15% of their population living in poverty.

Quantitative Findings:

The second research question is:

Is the federal ORLP program accomplishing its intended goals to promote outdoor recreation access to economically disadvantaged areas?

Through quantitative and spatial analyses, this report determines the socioeconomic characteristics of the census tracts with ORLP projects and how many existing parks are within a ten-minute walk of the ORLP projects.

Addressing economically disadvantaged communities and communities historically underserved in terms of park investments

Historically, communities of color have not had access to quality green spaces due to discriminatory housing practices, disinvestment in communities of color, or other discriminatory housing practices (Byrne et al. 2009; Wolch et al. 2014; Eldridge et al. 2019). The ORLP does not specifically address race or ethnicity, but does address “underserved” broadly in terms of access to quality park space. Across the first four grant cycles, as depicted in Table 3, the census tracts with ORLP projects are majority non-white census tracts (68.5%) and in all the grant cycles the census tracts are majority non-white (over 50%).

Next, this report investigated the highest level of educational attainment by looking at the percent of the population 25 years and older who have obtained less than a high school degree. Using the methodology developed by the Council of Environmental Quality for the Climate and Economic Justice Screening Tool (BETA), this report determined that census tracts with over 10% of the population 25 years and older who have obtained less than a high school degree are vulnerable to being underserved in terms of environmental amenities and would benefit from green job development as the ORLP program emphasizes (CEE 2022). For ORLP projects in the first four grant cycles, the census tract average for populations over 25 years and older who have not obtained a high school degree is 22.7%. As detailed in Table 3, the census tracts that have ORLP projects range from 15.5% to 27.9% of the population 25 years and older who have obtained less than a high school degree.

NPS emphasizes that ORLP funding should be allocated to economically disadvantaged communities and uses the federal poverty level as a means of measuring economically disadvantaged. In 2019, 12.6% of the U.S. population lived in poverty according to the American Community Survey. Based on the U.S. average and prevailing parks literature, this report determined that census tracts with 15% or more of their population living in poverty are vulnerable to being underserved in terms of environmental amenities. On average the population within the census tracts with ORLP projects are living in poverty. All rounds except for the first round have over 15% of their population living in poverty.
Table 3. Characteristics of Census Tracts

<table>
<thead>
<tr>
<th></th>
<th>Round 1</th>
<th>Round 2</th>
<th>Round 3</th>
<th>Round 4</th>
<th>Total Avg.</th>
<th>US Avg.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Race and Ethnicity</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White Alone</td>
<td>39.9%</td>
<td>32.8%</td>
<td>28.6%</td>
<td>30.2%</td>
<td>31.5%</td>
<td>60.7%</td>
</tr>
<tr>
<td>Non-white</td>
<td>60.1%</td>
<td>67.2%</td>
<td>71.5%</td>
<td>69.8%</td>
<td>68.5%</td>
<td>39.3%</td>
</tr>
<tr>
<td><strong>Population 25 Years and Over:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Less than High School</td>
<td>15.5%</td>
<td>21.0%</td>
<td>27.9%</td>
<td>21.8%</td>
<td>22.7%</td>
<td>12.0%</td>
</tr>
<tr>
<td>High School Graduate (Includes Equivalency) or higher</td>
<td>84.6%</td>
<td>79.0%</td>
<td>72.1%</td>
<td>78.2%</td>
<td>77.3%</td>
<td>88.0%</td>
</tr>
<tr>
<td><strong>Population Age 18 to 64 for Whom Poverty Status Is Determined:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Living in Poverty</td>
<td>14.7%</td>
<td>23.0%</td>
<td>28.1%</td>
<td>27.3%</td>
<td>24.9%</td>
<td>12.6%</td>
</tr>
<tr>
<td>At or Above Poverty Level</td>
<td>85.3%</td>
<td>77.1%</td>
<td>72.0%</td>
<td>72.7%</td>
<td>75.1%</td>
<td>87.4%</td>
</tr>
<tr>
<td><strong>Language Spoken At Home For The Population 5 Years And Over</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Speaks Only English</td>
<td>72.0%</td>
<td>68.0%</td>
<td>65.0%</td>
<td>71.0%</td>
<td>69.2%</td>
<td>78.4%</td>
</tr>
<tr>
<td>Speaks another language (Speaks English well)</td>
<td>14.8%</td>
<td>18.1%</td>
<td>16.8%</td>
<td>14.2%</td>
<td>15.5%</td>
<td>13.3%</td>
</tr>
<tr>
<td>Speaks another language (Speaks English Less Than “Very Well”)</td>
<td>13.2%</td>
<td>13.9%</td>
<td>18.2%</td>
<td>14.8%</td>
<td>15.3%</td>
<td>8.5%</td>
</tr>
<tr>
<td><strong>Total Population</strong></td>
<td>28,978</td>
<td>71,030</td>
<td>68,531</td>
<td>66,265</td>
<td>234,804</td>
<td>324,697,795</td>
</tr>
</tbody>
</table>
Planners are concerned with linguistic isolation because it poses challenges with accessibility to public services and community engagement processes (OEHHA 2021). The ORLP does not specifically address linguistic isolation, but does address “underserved” broadly where linguistic isolation fits in. The U.S. Census measures linguistic isolation by collecting data on which households speak a language other than English at home and speak English less than “very well.” As detailed in Table 3, on average 15.3% of the census tracts’ with ORLP projects population are linguistically isolated. However, only in the third round are the census tracts with ORLP funding over 15% linguistically isolated. The first, second, and fourth rounds range from 13-14% linguistically isolated.

Altogether, the census tracts with ORLP projects fall into the “underserved” metrics, pulled together from a variety of sources.

**Addressing park-poverty**

On average, the ORLP projects in the first four grant cycles are within a ten-minute walk of 3.2 existing parks according to the Trust for Public Land’s ParkServe Map (TPL 2021). It should be noted that 27 of the 66 projects this report investigates are renovation projects of existing parks and are therefore likely double counted in this analysis. As detailed in Table 4, 7.6% of ORLP projects are not within a ten-minute walk of any parks, indicating extreme park-poverty; 51.5% of ORLP projects are within a ten-minute walk of 1-3 parks; 31.8% of ORLP projects are within a ten-minute walk of 4-6 existing parks; and 9.1% ORLP projects are within a ten-minute walk of 7-10 existing parks.

Overall, 59.1% of ORLP projects are within a ten-minute walk of 0-3 existing parks. This indicates that the majority of the projects went to communities that are likely in need of additional outdoor recreation. In contrast, 40.9% of ORLP projects are within a ten minute walk of 4-10 existing parks. However, without additional information or analysis on the population density, park acreage, and other qualitative aspects which describe the current state of existing parks, it is difficult to determine the level of needs.

<table>
<thead>
<tr>
<th>Number of Parks within 10 Minute Walk</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td>5</td>
<td>7.6%</td>
</tr>
<tr>
<td>1-3</td>
<td>34</td>
<td>51.5%</td>
</tr>
<tr>
<td>4-6</td>
<td>21</td>
<td>31.8%</td>
</tr>
<tr>
<td>7-10</td>
<td>6</td>
<td>9.1%</td>
</tr>
<tr>
<td><strong>Total Number of ORLP projects:</strong></td>
<td><strong>66</strong></td>
<td></td>
</tr>
</tbody>
</table>
these communities faced in terms of access to high quality parks. Based simply on the amount of existing parks in the nearby vicinity, 40.9% of ORLP projects did not go to high-need, underserved communities.

**Recommendations**

Based on the findings from the stakeholder interviews and the quantitative analysis, I have developed a number of recommendations that could inform future reform of the ORLP program that can be beneficial to the National Park Service, the State Liaison Agencies that administer the ORLP program and other park equity programs as well as park equity advocates.

**Recommendation 1:** The National Park Service should create more feasible and clearer project parameters when releasing the Notice of Funding Opportunity (NOFO) as well as create more consistent and predictable application timelines.

State Liaison Agencies with varying levels of experience with the ORLP program expressed that the timeline to submit an application for a new outdoor recreation project or large redevelopment of an existing outdoor recreation project was challenging based on the current NPS timeline. NPS should allocate additional time at the beginning of the ORLP application process to allow for State Liaison Agencies to solicit ORLP applications and provide technical assistance and project feedback to potential ORLP applicants, and for ORLP applicants to find a reliable source of matching funding for the ORLP grant. For example, State Liaison Agencies indicated that they usually had 3-4 months to administer their own competitive application process prior to submitting to NPS and felt that economically disadvantaged areas did not have the capability to turnaround an application in that timeframe.

State Liaison Agencies and ORLP grant applicants also expressed frustration about the lack of clarity about the timeline after ORLP application submission. Some ORLP applicants stated that they account for the increase in land value and construction costs that occur by the time they receive their grant agreement; however NPS is often late to notify applicants that they have or have been invited to submit a final application. Meanwhile, applicants have to hold onto their 50% match for an unclear amount of time. Some applicants wait years before they are finally able to start construction on their projects and have lost their source of matching funds because of a shift in priorities or because the grant agreement fell through. Additionally, many projects increase in cost the longer they wait for NPS to reach a grant agreement due to inflation and unforeseen costs like the supply chain disruption caused by the COVID-19 pandemic. Many applicants stated that simply knowing when or if they will receive funding by a specified date would reduce this challenge as they can better budget for their projects. NPS should provide clearer guidance on when ORLP applicants will receive feedback on their application, when ORLP ap-
Applicants will be notified if they have or have not received an award, and when NPS needs additional follow-up materials.

Stakeholders also expressed confusion over project parameters specifically related to: (1) defining an “underserved community”; (2) how the outdoor recreation project would stimulate economic growth and job development; and (3) how to measure park-poverty. At the time of this research, NPS completed four grant cycles and in each grant cycle, the definition for these parameters changed slightly. These changes are understandable, as the ORLP program is still relatively new and NPS is trying to create the most applicable definitions that are responsible to both administrative and community needs. However, these inconsistent parameters present a challenge to ORLP applicants and the State Liaison Agencies. As previous literature has discussed, ambiguity in population parameters often leads to funding gaps and underutilized policies as seen in the ORLP program (Davies et al. 2019). Most ORLP applicants used parameters provided by the State Liaison Agency, but many stakeholders adopted varied definitions. In previous park policy evaluations, stricter language around “underserved park-poor and low-income communities” resulted in more funding going to the targeted communities (Davies et al. 2019, p 10). Many stakeholders indicated that they used a park shed calculator to measure park-poverty, like measuring a half-mile/quarter-mile/ten-minute walk estimate of existing parks in the community, the federal poverty level to measure economically disadvantaged, and other state specific pollution burden metrics to create a narrative as to how their ORLP project reached underserved communities. NPS should create clear and measurable definitions for underserved communities, job development standards, and park-poverty so that the projects can be evaluated using the same criteria. Callahan et al. recommend developing metrics that center pollution burden, risk of climate change impact, communities of color and low-income communities with fewer government resources, households likely to be impacted by the transition from fossil fuels to a clean, equitable economy, and low-wealth households that have benefited the least from environmental investments (Callahan 2012, p. 50). Additionally, NPS can look towards metrics used by State Liaison Agencies who have successfully obtained ORLP funding. Below are some examples:

- California’s Community Fact Finder utilizes park space per 1,000 residents, number of families below poverty, and the median household income in proximity to the project to identify park-poor and high need communities (California State Parks 2020).
- New Jersey’s Statewide Overburdened Communities Map utilizes the federal poverty level, race, ethnicity and tribal status, and limited English proficiency to identify environmental justice communities (NJDEP 2022).
- Massachusetts Environmental Justice Populations Map utilizes annual median household income, ‘minority status’, limited English language proficiency, and an index...
Recommendation 2: NPS, the State Liaison Agencies, and local governments should create a park needs assessment to target ORLP funds to park-poor communities.

In order to successfully outreach to communities that have the most to gain from ORLP funds, municipalities and parks and recreation agencies should create an inventory on existing parks to evaluate the quantity and quality of the parks available. Then using whichever metrics the municipality deems fit (i.e. ten-minute walk to park analysis, park acreage per thousand residents metrics, race/ethnicity metrics, income/federal poverty level metrics), the municipality should determine which communities are in need of new or improved outdoor recreational opportunities. Examples of municipalities that measured their park needs include: the County of Los Angeles, California’s Park Needs Assessment (2016)* and the City of Seattle, Washington’s Parks and Open Space Plan (2017).** These proactive planning efforts help municipalities determine the community’s needs in terms of parks and enable the States to submit more competitive ORLP applications.

At the national level, NPS could

of these measurements to determine environmental justice communities (Massachusetts Executive Office of Energy and Environmental Affairs 2019).

- Washington’s Environmental Health Disparities Map utilizes environmental exposures (NOx-diesel emissions; ozone concentration; PM2.5 Concentration; populations near heavy traffic roadways; toxic release from facilities (RSEI model)), environmental effects (lead risk from housing; proximity to hazardous waste treatment, storage, and disposal facilities (TSDFs); proximity to National Priorities List sites (Superfund Sites); proximity to Risk Management Plan (RMP) facilities; wastewater discharge), sensitive populations (death from cardiovascular disease; low birth weight) and socioeconomic factors (limited English; no high school diploma; poverty; race - people of color; transportation expense; unaffordable housing; unemployed) (Washington State Department of Health 2022).

An emerging tool which NPS, State Liaison Agencies, and potential ORLP applicants can also look towards is the Climate and Economic Justice Screening Tool (Beta). This tool is still in its early stages, however, it aims to identify communities “that are disadvantaged for the purposes of the Justice40 Initiative using census tracts” (CEQ 2022). A census tract is considered disadvantaged if the census tract is above the threshold for one or more environmental or climate indicators and the census tract is above the threshold for the socioeconomic indicators (CEQ 2022).*

---

* Please see: https://screeningtool.geoplatform.gov/en/methodology for a full list of indicators.

---

* Please see: https://lacountyparkneeds.org/

** Please see: https://www.seattle.gov/documents/Departments/ParksAndRecreation/PoliciesPlanning/2017Plan/2017ParksandOpenSpacePlanFinal.pdf
look towards nonprofits like the Trust for Public Land (TPL) to utilize their ParkServe Map which maps a ten-minute walkable service area from each existing park they have collected data on, park priority areas, and heat-risk priority zones (TPL 2022). A national-level tool is beneficial in that all ORLP applicants and State Liaison Agencies would then have comparable data on how their projects reach an underserved community in terms of access to outdoor recreation. This comparable tool would also be valuable to NPS staff that conduct the technical review and the merit review panel in having one defined measurement for park-poverty to then be able to equitably compare and contrast ORLP projects.

Through the LWCF Act, NPS offers planning grants to provide funding to update the State Liaison Agency’s SCORPs (DOI 2022). These planning grants offer an opportunity for the State Liaison Agencies to update their SCORPs to address the demand for urban parks which serve underserved communities and address how the State Liaison Agency will address this demand. The planning grant can offer funds for State Liaison Agencies with fewer resources to determine which underserved, economically disadvantaged, urban areas would benefit the most from ORLP and begin targeting funds towards these communities.

There are opportunities at all levels of the ORLP process for NPS, State Liaison Agencies, and local governments to develop a park needs assessment in some form to direct ORLP funds to underserved, economically disadvantaged, urban areas.

**Recommendation 3: NPS should increase technical assistance capacity for ORLP applicants and State Liaison Agencies after the NOFO is initially released as well as throughout the life cycle of the grant period.**

In addition to following a consistent timeline and clarifying definitions in the NOFO, NPS should also provide technical assistance more regularly on the ORLP application process for State Liaison Officers and ORLP applicants to better understand the ORLP guidelines and processes. As Callahan et al. describe, competitive grant programs typically rely on the applicants to be proactive in seeking technical assistance and feedback. However, to better target underserved communities, program operators, like NPS, must adequately “disseminate information” to eligible communities on the program details and resources, like technical assistance, to support underserved communities (Callahan et al. 2021, p. 64). State Liaison Agencies can also help disseminate information of the ORLP program to reach the communities most in need, however, many of the states indicated with the quick short timeline in the front-end, it is difficult to provide robust outreach and technical assistance. Many stakeholders suggest quarterly webinars so NPS could detail their expectations for ORLP applications and demystify the process. NPS should continue and increase partnerships with nonprofits,
like the City Parks Alliance (CPA),* National Association of State Outdoor Recreation Liaison Officers (NASOR-LO), National Parks and Recreation Association (NRPA) and TPL, in their technical assistance capabilities through webinars. These webinars discuss how to write a strong ORLP application and answer questions regarding the ORLP program. By creating time for NPS to clearly communicate the intention of the ORLP program to stakeholders, the applicants will be better equipped to apply to ORLP.

Alongside the increased technical assistance capacity, NPS and the State Liaison Agencies should work with nonprofit partners, like CPA and TPL to increase awareness of the ORLP program. Generally, smaller municipalities with fewer resources are stretched thin and may not know about the ORLP program. This lack of awareness is keeping underserved communities from applying to ORLP funding. NPS and the State Liaison Agencies must take proactive steps in ensuring municipalities that are not applying and are eligible to apply for ORLP funds, are aware of the program along with other park equity opportunities.

An additional recommendation that emerged through stakeholder conversations included the NPS intentionally dedicating time after the initial NOFO is released so that State Liaison Agencies can meet with NPS to better understand the nuances of the new grant cycle and present the projects they will be submitting to NPS for feedback and initial review. Some State Liaison Agencies stated they felt they had robust communication and feedback from NPS as they frequently initiated the conversation with NPS. These State Liaison Agencies initiated meetings with NPS to obtain feedback regarding if the projects their urban areas intended to submit were eligible for ORLP and if there were additional complications the State Liaison Agency should consider. These agencies felt they had more success in obtaining ORLP funds and had better relationships with NPS. However, this report also found that staff capacity is a challenge at the federal level as well in providing technical assistance and reviewing outreach to ORLP applicants. NPS could look into contracting this technical assistance work to nonprofits or others to provide initial feedback and review for ORLP applicants prior to the first submission.

Recommendation 4: NPS should increase and promote more transparent communication between the State Liaison Agencies and the ORLP applicants at all stages of the ORLP process.

As previously mentioned, the ORLP program is long and often complex for underserved, urban areas. The interviewees expressed a desire for more transparency and communication regarding the phase of review for applications and feedback when projects are rejected. Interviewees felt that the merit review process needed additional clarification regarding who

* Please see: https://cityparksalliance.org/event/outdoor-recreation-legacy-partnership-orlp-program-urban-grant-technical-assistance/ for previous examples of webinars in partnership with CPA, TPL, and NPS.
is selected to be on the merit review panel, the training NPS provides the merit review panel and whether this training includes any equity training, and what disqualifies applications during the merit review process. By providing more guidance and transparency on what occurs during the merit review process, ORLP applicants can better prepare for future applications and park equity advocates and others may have greater confidence in the ORLP program evaluation and decision-making process.

Many interviewees indicated that when NPS did not select their ORLP applications for the final application, they felt confused and did not receive feedback on what their project was missing. These interviewees often felt that they had strong applications that met the general parameters regarding the ORLP program. This report recommends that NPS provide feedback to the ORLP applicants as to why their projects are denied regardless of whether or not the State Liaison Agencies ask for this feedback. Currently, NPS provides feedback after the State Liaison Agency has requested the feedback and does not proactively provide feedback. This information can help future applicants and can strengthen existing ORLP applications to be submitted for the next grant cycle.

Interviewees also expressed a desire for NPS to ‘lead with yes.’ This ‘lead with yes’ mentality includes NPS not rejecting applications for potentially solvable issues in the project, but rather connecting with the State Liaison Agency or ORLP applicant to work through these issues with the project so that NPS can recommend the project for final review. Again, this requires more staff capacity at the federal level or requires NPS to contract this technical assistance capacity to nonprofit partners or other park equity organizations.

**Recommendation 5: NPS and park equity advocates should conduct further research on how to improve the ORLP program and the LWCF State and Local Assistance Program more broadly.**

Throughout the interviews, we encountered many barriers and challenges to the ORLP program which are not necessarily specific to the ORLP program but the LWCF Act and Local and Stateside Program more broadly. These challenges included staff capacity, matching grant requirements, the ‘in-perpetuity’ requirement, and the population requirement.

Many stakeholders expressed that the ORLP grant application and administration is time consuming and requires parks and recreation agencies to excessively utilize knowledgeable staff to administer the program. The ORLP program is designed to benefit underserved, economically disadvantaged communities. Many of these communities do not have grant-writing staff or the financial and technical capacity to administer a grant program. A significant barrier to this program is lack of staff and experience in applying to the ORLP program and other LWCF grant programs. However, at the point of this study it is unclear how many
full-time staff should be dedicated to LWCF programs for each state and the funding mechanism that would be used to support full-time staff. This report implores further research into the needs of each state to determine their staff capacity level and needs for moving forward with the ORLP program and LWCF more broadly.

Many stakeholders expressed that the matching grant is a barrier to applying for ORLP grants. The ORLP program requires applicants to provide proof of a 50% match when submitting their initial application. As previously noted, once applicants submit their application it is unclear when they will receive notice of whether or not they received the ORLP grant. Additionally, the ORLP program is intended to serve urban areas with populations of over 50,000. These urban areas often have higher land values and construction costs than other LWCF projects, making it difficult for economically disadvantaged communities to secure matching grants and to hold these funds for an unknown amount of time. Many State Liaison Offices expressed that the urban areas they are in contact with are discouraged from applying for ORLP funds because of the large matching grant requirement.*

Further research should investigate how the matching grant requirement should be reduced or replaced with a sliding-scale grant requirement based on need. Many applicants stated that by reducing the match requirement or using a sliding-scale metric for the match requirement more urban areas could apply for ORLP funding and ORLP applicants could hold onto their match for longer. A case study that can be used as an example is Washington’s Recreation and Conservation Office’s Washington Wildlife and Recreation Program which reduces or waives the local agency’s match “if the project meets the needs of underserved population or a community in need, as defined by the board” (SB 6227 2016). Additionally, the Outdoors for All Act legislation would allow for the Secretary to waive all or part of the match requirement for LWCF programs if “no reasonable means are available through which the eligible entity can meet the matching requirement and the probable benefit of the project outweighs the public interest in the matching requirement” (SB 2887 2021).

An additional barrier that is not specific to the ORLP program is the ‘in-perpetuity’ requirement. Because LWCF projects must be maintained in perpetuity, they require staff to conduct compliance checks and require a complex process if the community decides to convert the property. The conversion process requires approval from the Secretary of the Interior and a substitute recreation property of at least equal fair market value and of reasonably equivalent usefulness and location (DOI 2022). However, not all stakeholders agreed that the ‘in perpetuity’ requirement should be updated as many appreciated the promise to conserve the public land. Further research should address the ‘in perpetuity’ requirement.

* ORLP applicants are also allowed to use in-kind contributions as a match and are not restricted to only match in the form of cash. However, this report found that most ORLP applicants utilized state and local grant programs as forms of match and did not frequently use in-kind contributions.
tuity’ requirement to better understand the needs of urban communities and the State Liaison Agencies.

The population requirement of 50,000 or more is specific to the ORLP program and not LWCF generally, but the interviewees addressed this as a challenge. Specifically, State Liaison Agencies in more rural states addressed the population requirement as a barrier to applying to ORLP funds as they had fewer eligible urban areas in comparison to more densely populated states. Many stakeholders and park equity advocates stated that by reducing the population requirement from 50,000 to 30,000, there would be more eligible urban areas and increase the ability of ORLP to reach underserved communities. NPS should conduct further research to determine the potential benefit to reducing the population requirement to benefit more rural states.

Lastly, this report was not able to touch on the tribal involvement of the ORLP program due to time and research limitations. However, this report implores further research into how the ORLP program can be better adapted to meet tribal community’s needs. The ORLP program states that “local units of government and federally-recognized Indian Tribes” are eligible to apply to ORLP funds if they meet the population requirement and are within an underserved community in terms of access to parks (NPS 2020). As of the most recent grant cycle, no tribal communities have applied for ORLP funds. The Department of the Interior (DOI) released their Equity Action Plan in 2022, which details how DOI programs, like LWCF and ORLP, can better engage tribal communities and address previous inequities.” DOI and NPS should continue their research into engagement strategies for tribal communities to promote equitable planning practices and address historical inequities between the US government and tribal communities.


## Conclusion

The ORLP program is a federal program intended to serve urban areas that are economically disadvantaged and underserved in terms of access to outdoor recreation. While this program has funded many important projects, this research identifies many challenges and barriers keeping this program from being fully realized.

In partnership with the Wilderness Society, this report utilizes a mixed-methods approach to answer: Is the federal ORLP program accomplishing its intended goals to promote outdoor recreation access to economically disadvantaged areas? What are potential barriers that prevent urban areas from better utilizing ORLP funding? The first stage of this project conducted stakeholder interviews to understand the opportunities and challenges of the ORLP program. The second stage of this project included generating spatial and descriptive statistics to better understand if the ORLP program was reaching park-poor, economically disadvantaged, and urban areas.

The stakeholders stated they appreciated that the ORLP program
focused on urban areas, provided larger, allowed applicants to utilize funding for renovation projects, and that NPS had hired a dedicated ORLP staff person to increase communication and improve administration. Stakeholders identified that the main challenges to this program are that the timeline to the grant cycles and the language to apply to the program is inconsistent and difficult to prepare for, program applicants must provide a 50% match in funding thus creating a financial burden on economically disadvantaged communities, many economically disadvantaged municipalities and State Liaison Agencies do not have the staff capacity or resources to apply to this federal program, and communication with NPS has been inconsistent throughout the grant processes. Additionally, this project found the ORLP program is reaching census tracts which have been historically underserved in terms of park access and park planning processes by looking at racial/ethnic demographics, federal poverty level, educational attainment, and linguistic isolation. However, when looking at whether the ORLP program is reaching communities that are park-poor our results indicate that around 60% are going to underserved communities.

Through this research, I determined five recommendations which would reduce the challenges and barriers to applying for ORLP and help funds reach underserved, economically disadvantaged, and urban communities as the program intends.

1. The National Park Service (NPS) should create more feasible and clearer project parameters when releasing the Notice of Funding Opportunity (NOFO) as well as create more consistent and predictable application timelines.

2. NPS, the State Liaison Agencies, and local governments should create a park needs assessment to target ORLP funds to park-poor communities.

3. NPS should increase technical assistance capacity for ORLP applicants and State Liaison Agencies after the NOFO is initially released as well as throughout the life cycle of the grant period.

4. NPS should increase and promote more transparent communication between the State Liaison Agencies and the ORLP applicants at all stages of the ORLP process.

5. NPS and park equity advocates should conduct further research on how to improve the LWCF and the ORLP program more broadly.

Despite these challenges within the ORLP program, most stakeholders identified that the program’s intent and dedicated funding amounts to park-poor and economically disadvantaged urban areas was a step in the right direction for park planning efforts. The ORLP Program is positioned to be an increasingly important program as more funding becomes available for urban parks, the Biden-Harris administration continues to prioritize equity through the Justice 40 initiative, and through the potential to codify the ORLP program into law as the Outdoors for All legislation moves through Congress (SB 2887). NPS, the State Liaison Agencies, and park equity advocates must work together to ensure that this program fulfills its intended
goals of reaching park-poor, economically disadvantaged, and urban areas to improve the distributional equity of parks across the United States.
Appendix A. ORLP Application Process

1. **Notice of Funding Opportunity**: NPS posts a Notice of Funding Opportunity (NOFO) on Grants.gov announcing the availability of ORLP funds, stating the requirements for that year’s competition, and providing a deadline for submissions.

2. **State Project Competition**: The LWCF State Liaison Agency collects proposals from eligible project sponsors/sub-recipients for projects through the state’s approved Open Project Selection Process and selects projects meeting the purpose and requirements of the ORLP program. Some states have a separate ORLP competition and others do not.

3. **State Pre-Application Submittal to NPS National Competition**: The LWCF State Liaison Agency works with the selected project sponsor/sub-recipients to complete the pre-application requirements and submits the completed package under NPS’s ORLP funding opportunity on Grants.gov by the stated deadline.

4. **NPS Eligibility Review**: NPS reviews the submitted pre-applications for eligibility, including: seeing that the project aligns with the purpose of the ORLP program; that the project sponsor is an eligible sub-recipient; the proposal includes the required amount of matching share, etc.

5. **Technical Review Period**: NPS staff then conduct a technical review of the proposals to determine if the project is feasible: including that the budget items are allowable and reasonable; the project be completed within a 2-3 year timeline and begin within a year of selection; the project aligns with at least one of the State’s Comprehensive Outdoor Recreation Plan priorities, etc.; and, to identify any major NEPA or other compliance issues. If a project is identified as having significant feasibility issues, it may be eliminated from further review.

6. **Merit Review Panel**: The remaining, eligible projects are forwarded for review by a merit review panel, composed of professionals in fields related to the competition’s merit criteria, to measure the quality of the project including: how well the project supports the needs of underserved, economically-disadvantaged, park-poor areas; how well the community is involved in and supports the project; the extent of any economic benefits to the local community, etc.

7. **National Ranking and Certification by NPS Director**: The technical and merit review panel’s scores and evaluations are then used by the competition managers to produce a ranked list of recommended projects. These are put forward to the Director of NPS for concurrence. Projects that rank and/or
score relatively low may not be recommended for funding.

8. **State Notification and Final Application Preparation:** Once the Director approves the proposed recommendation of projects, and a public announcement is made, states are notified as to which projects have been selected. The state then must work with NPS and the project sponsor to complete the remaining final application requirements and address any issues identified with the project during the review.

9. **Final NPS Review:** After NPS has received the remaining final application documents, staff conduct a final review. During this period, a project can still be disqualified if new information is uncovered that leads to determining that the project cannot be completed as proposed or has other issues that make it not fundable.

10. **Grant Agreement:** If no issues arise during the Final Review, the project is awarded through a grant agreement.
Appendix B. Stakeholder Interview List

1. Allen Gallant - MetroParks Toledo, Ohio
2. Andrea Vona - County of Los Angeles, Department of Parks and Recreation
3. Antoinette Norfleet - Georgia Department of Natural Resources
4. Audrey Mularie - Minnesota Department of Natural Resources
5. Bianca Shulaker - Trust for Public Land
6. Catherine Matthews - City of Las Cruces, Parks & Recreation Administration Office
7. Clement Lau - County of Los Angeles, Department of Parks and Recreation
8. Courtney Wald-Wittkop - New Jersey Department of Environmental Protection
9. David Certain - New Mexico State Parks
10. Doug Eiken - National Association of State Outdoor Recreation Liaison Officers (NASORLO)
11. Elisabeth Fondriest - National Park Service
12. Elva Yanez - Policy Prevention Institute
13. Fletcher Jacobs - Colorado Department of Natural Resources
14. Heather Ramsay Ahndan - King County Department of Natural Resources and Parks
15. Howard Gross - Principal, HG Conservation Solutions, LLC, Santa Fe, New Mexico
16. Justin Hancock - South Carolina Department of Parks, Recreation & Tourism
17. Karl Jacobs - Washington State Recreation and Conservation Office
18. Kyle Simpson - National Recreation and Parks Association
19. Lisa Cotner - Illinois Department of Natural Resources
20. Marguerite Austin - Washington State Recreation and Conservation Office
21. Melissa Cryan - Massachusetts Division of Conservation Services
22. Natalie Bee - California Department of Parks and Recreation
23. Robert Warner - City of Seattle, Seattle Parks and Recreation
24. Sedrick Mitchell - California Department of Parks and Recreation
25. Stephanie Flynn - Trust for Public Land
26. Viktor Patino - California Department of Parks and Recreation
27. Virginia Carter - National Park Service
### Appendix C. ORLP Selected Projects (Rounds 1-4)

<table>
<thead>
<tr>
<th>Project Year</th>
<th>Project Name</th>
<th>Project Type*</th>
<th>Amount Funded</th>
<th>Project Lead Agency</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>Athletic Complex at Belle Isle Park</td>
<td>R</td>
<td>$325,000</td>
<td>The Michigan Department of Natural Resources</td>
<td>MI</td>
</tr>
<tr>
<td>2014</td>
<td>Three Mile Creek</td>
<td>D</td>
<td>$386,525</td>
<td>The City of Mobile</td>
<td>AL</td>
</tr>
<tr>
<td>2014</td>
<td>Johnson Oak Park</td>
<td>R</td>
<td>$375,000</td>
<td>The City of Bridgeport</td>
<td>CT</td>
</tr>
<tr>
<td>2014</td>
<td>Montebello</td>
<td>D</td>
<td>$250,000</td>
<td>The City of Denver</td>
<td>CO</td>
</tr>
<tr>
<td>2014</td>
<td>Thomas Cully Park.</td>
<td>D</td>
<td>$500,000</td>
<td>The City of Portland, Verde, and private partners</td>
<td>OR</td>
</tr>
<tr>
<td>2014</td>
<td>Sheridan Memorial Park</td>
<td>D</td>
<td>$500,000</td>
<td>The Minneapolis Park and Recreation Board</td>
<td>MN</td>
</tr>
<tr>
<td>2014</td>
<td>Skate Park - Central Park in Madison’s Near East Side</td>
<td>D</td>
<td>$295,308</td>
<td>The City of Madison</td>
<td>WI</td>
</tr>
<tr>
<td>2015</td>
<td>Bay Point Wetland Restoration and Public Access Project</td>
<td>D</td>
<td>$750,000</td>
<td>East Bay Regional Park District (Bay Point), CA</td>
<td>CA</td>
</tr>
<tr>
<td>2015</td>
<td>Belle Isle Park Multi-Use Looped Trail Development</td>
<td>D</td>
<td>$750,000</td>
<td>Michigan DNR (Detroit)</td>
<td>MI</td>
</tr>
<tr>
<td>2015</td>
<td>Clary-Shy Park Urban Demonstration Farm</td>
<td>D</td>
<td>$400,000</td>
<td>City of Columbia, MO</td>
<td>MO</td>
</tr>
<tr>
<td>2015</td>
<td>Youth Campground Improvements in Gwynns Falls Leakin Park</td>
<td>R</td>
<td>$750,000</td>
<td>City of Baltimore, MD</td>
<td>MD</td>
</tr>
<tr>
<td>2015</td>
<td>Skyway Park Revitalization</td>
<td>R</td>
<td>$369,626</td>
<td>King County Parks (Seattle), WA</td>
<td>WA</td>
</tr>
<tr>
<td>2015</td>
<td>Bay View Park Playground Improvement Project</td>
<td>R</td>
<td>$375,225</td>
<td>City of San Francisco, CA</td>
<td>CA</td>
</tr>
<tr>
<td>2015</td>
<td>Development of Muldoon Town Square Park</td>
<td>D</td>
<td>$750,000</td>
<td>Municipality of Anchorage, AK</td>
<td>AK</td>
</tr>
<tr>
<td>2015</td>
<td>Comiskey Park Development</td>
<td>D</td>
<td>$508,000</td>
<td>City of Dubuque, IA</td>
<td>IA</td>
</tr>
</tbody>
</table>

* R = Renovation, D = Development, A = Acquisition
<table>
<thead>
<tr>
<th>Year</th>
<th>Project Name</th>
<th>Type</th>
<th>Amount</th>
<th>City/State</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>Buffalo Bend Hidalgo Park Greenway</td>
<td>A</td>
<td>$750,000</td>
<td>City of Houston, TX, TX</td>
</tr>
<tr>
<td>2015</td>
<td>Manhattan Marsh park Development</td>
<td>D</td>
<td>$475,000</td>
<td>Toledo Metroparks (Toledo), OH</td>
</tr>
<tr>
<td>2015</td>
<td>Edward Rendon Sr Metro Park – further development</td>
<td>D</td>
<td>$750,000</td>
<td>City of Austin, TX</td>
</tr>
<tr>
<td>2015</td>
<td>Renovation of Colt Park Athletic Fields</td>
<td>R</td>
<td>$750,000</td>
<td>City of Hartford, CT</td>
</tr>
<tr>
<td>2015</td>
<td>Lincoln Park Restoration</td>
<td>R</td>
<td>$750,000</td>
<td>City of Duluth, MN</td>
</tr>
<tr>
<td>2015</td>
<td>Father Tucker Park Playground and Spray Pad</td>
<td>D</td>
<td>$306,447</td>
<td>City of Wilmington, DE</td>
</tr>
<tr>
<td>2015</td>
<td>Burnham Park Redevelopment Project</td>
<td>R</td>
<td>$399,255</td>
<td>Milwaukee Rec/Public Schools, WI</td>
</tr>
<tr>
<td>2015</td>
<td>New Neighborhood Park on Burlington’s Waterfront Land Acquisition</td>
<td>A</td>
<td>$500,000</td>
<td>City of Burlington, VT</td>
</tr>
<tr>
<td>2015</td>
<td>Enota Park Development</td>
<td>D</td>
<td>$600,000</td>
<td>City of Atlanta, GA</td>
</tr>
<tr>
<td>2015</td>
<td>North Camden Waterfront Park</td>
<td>D</td>
<td>$750,000</td>
<td>City of Camden, NJ</td>
</tr>
<tr>
<td>2015</td>
<td>Central Plaza John Chavis Memorial Park Revitalization</td>
<td>D</td>
<td>$747,600</td>
<td>City of Raleigh, NC</td>
</tr>
<tr>
<td>2015</td>
<td>Swan Creek Park Trail Network</td>
<td>R</td>
<td>$750,000</td>
<td>Metro Parks Tacoma, WA</td>
</tr>
<tr>
<td>2015</td>
<td>Sparta Court Soccer Fields</td>
<td>A</td>
<td>$450,000</td>
<td>St. Louis Co. Port Authority (Wellston) MO</td>
</tr>
<tr>
<td>2015</td>
<td>Jesse Allen Park</td>
<td>R</td>
<td>$750,000</td>
<td>City of Newark, NJ</td>
</tr>
<tr>
<td>2017</td>
<td>Athens Street Park Development</td>
<td>D</td>
<td>$633,231</td>
<td>Hall County, GA</td>
</tr>
<tr>
<td>2017</td>
<td>May Branch Railroad Trail Phase I</td>
<td>A</td>
<td>$750,000</td>
<td>The City of Fort Smith, AR</td>
</tr>
<tr>
<td>2017</td>
<td>Portland Landing Park Development Project</td>
<td>D</td>
<td>$750,000</td>
<td>The City of Portland, ME</td>
</tr>
<tr>
<td>2017</td>
<td>Zamora Park Renovation</td>
<td>R</td>
<td>$750,000</td>
<td>The City of El Monte, CA</td>
</tr>
<tr>
<td>2017</td>
<td>Douglass Park Redevelopment</td>
<td>R</td>
<td>$485,000</td>
<td>The City of Memphis, TN</td>
</tr>
<tr>
<td>Year</td>
<td>Project Name</td>
<td>Type</td>
<td>Funding</td>
<td>Description</td>
</tr>
<tr>
<td>------</td>
<td>------------------------------------------------</td>
<td>------</td>
<td>---------</td>
<td>-------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>2017</td>
<td>Clippership Connector - Mystic River Reservation</td>
<td>D</td>
<td>$732,434</td>
<td>The Massachusetts Department of Conservation and Recreation</td>
</tr>
<tr>
<td>2017</td>
<td>Western Hills Park Legacy Project</td>
<td>R</td>
<td>$750,000</td>
<td>The City of Little Rock</td>
</tr>
<tr>
<td>2017</td>
<td>Apodaca Park Renovation</td>
<td>R</td>
<td>$750,000</td>
<td>The City of Las Cruces</td>
</tr>
<tr>
<td>2017</td>
<td>Downtown Waterfront Metropark</td>
<td>R</td>
<td>$750,000</td>
<td>Development Metroparks Toledo</td>
</tr>
<tr>
<td>2017</td>
<td>Galena Park Development</td>
<td>D</td>
<td>$372,050</td>
<td>The City of Milwaukee Department of Public Works</td>
</tr>
<tr>
<td>2017</td>
<td>Modrzejewski Playfield Redevelopment</td>
<td>R</td>
<td>$750,000</td>
<td>The Milwaukee Public Schools Department of Recreation and Community Services</td>
</tr>
<tr>
<td>2017</td>
<td>Rev. Charles Williams Park Development</td>
<td>D</td>
<td>$750,000</td>
<td>The City of Indianapolis</td>
</tr>
<tr>
<td>2017</td>
<td>Woonasquatucket River Adventure Park Phase II</td>
<td>D</td>
<td>$375,000</td>
<td>The City of Providence</td>
</tr>
<tr>
<td>2017</td>
<td>Peeler Community Park</td>
<td>R</td>
<td>$600,000</td>
<td>The City of Greensboro</td>
</tr>
<tr>
<td>2017</td>
<td>Bowling Green Riverwalk Park</td>
<td>D</td>
<td>$750,000</td>
<td>The City of Bowling Green</td>
</tr>
<tr>
<td>2017</td>
<td>Midway Peace Park</td>
<td>D</td>
<td>$250,000</td>
<td>The City of St. Paul</td>
</tr>
<tr>
<td>2017</td>
<td>South Park Playground, Spray Park, and Playfield</td>
<td>R</td>
<td>$750,000</td>
<td>The City of Seattle, Parks and Recreation</td>
</tr>
<tr>
<td>2017</td>
<td>Mifflin Square Park Phase I Redevelopment</td>
<td>R</td>
<td>$750,000</td>
<td>The City of Philadelphia</td>
</tr>
<tr>
<td>2019</td>
<td>Cooper River County Park Development</td>
<td>D</td>
<td>$1,000,000</td>
<td>Charleston County Park and Recreation Commission</td>
</tr>
<tr>
<td>2019</td>
<td>Tidewater Estuary Park Improvements and Public Access</td>
<td>D</td>
<td>$1,000,000</td>
<td>East Bay Regional Park District (San Francisco)</td>
</tr>
<tr>
<td>2019</td>
<td>Middle Branch Park Trail and Water Access</td>
<td>D</td>
<td>$1,000,000</td>
<td>City of Baltimore</td>
</tr>
<tr>
<td>2019</td>
<td>Tacoma Street Playground Renovation</td>
<td>R</td>
<td>$1,000,000</td>
<td>City of Worcester</td>
</tr>
<tr>
<td>2019</td>
<td>Battle Park Renovation</td>
<td>R</td>
<td>$500,000</td>
<td>City of Rocky Mount</td>
</tr>
<tr>
<td>Year</td>
<td>Project Description</td>
<td>Funding Source</td>
<td>Amount</td>
<td>City/County/State</td>
</tr>
<tr>
<td>------</td>
<td>------------------------------------------------------------------</td>
<td>----------------</td>
<td>--------------</td>
<td>---------------------------</td>
</tr>
<tr>
<td>2019</td>
<td>Wards Lake Park Enhancement</td>
<td>R</td>
<td>$1,000,000</td>
<td>City of Lakewood</td>
</tr>
<tr>
<td>2019</td>
<td>Equitable Access to Paddle Sport Recreation at Kingman Island</td>
<td>D</td>
<td>$781,800</td>
<td>Department of Energy and Environment</td>
</tr>
<tr>
<td>2019</td>
<td>Central Place Levee Trail - Phase I</td>
<td>D</td>
<td>$500,000</td>
<td>City of Des Moines</td>
</tr>
<tr>
<td>2019</td>
<td>A New Vision for The Old Chain of Rocks Bridge Park and Trailhead</td>
<td>D</td>
<td>$990,000</td>
<td>Great Rivers Greenway (St. Louis)</td>
</tr>
<tr>
<td>2019</td>
<td>Ortega Park Revitalization Project</td>
<td>R</td>
<td>$1,000,000</td>
<td>City of Santa Barbara Parks and Recreation</td>
</tr>
<tr>
<td>2019</td>
<td>Flint River Restoration Project</td>
<td>R</td>
<td>$1,000,000</td>
<td>Genesee County</td>
</tr>
<tr>
<td>2019</td>
<td>Whitman Park Improvement and Expansion</td>
<td>R</td>
<td>$1,000,000</td>
<td>Camden County</td>
</tr>
<tr>
<td>2019</td>
<td>Clark Avenue Park Development Project</td>
<td>D</td>
<td>$661,724</td>
<td>City of Cleveland</td>
</tr>
<tr>
<td>2019</td>
<td>Maple Wood Playfield Renovation</td>
<td>R</td>
<td>$1,000,000</td>
<td>Seattle Parks and Recreation</td>
</tr>
<tr>
<td>2019</td>
<td>Extending the Kinnickinnic River Oak Leaf Trail to High Needs Areas</td>
<td>R</td>
<td>$453,954</td>
<td>City of Milwaukee</td>
</tr>
<tr>
<td>2019</td>
<td>Ford’s Theater Hiking Trail</td>
<td>D</td>
<td>$999,822</td>
<td>County of Los Angeles Department of Parks and Recreation</td>
</tr>
<tr>
<td>2019</td>
<td>Glass City Metropark: Urban Camping</td>
<td>D</td>
<td>$1,000,000</td>
<td>Metroparks Toledo</td>
</tr>
<tr>
<td>2019</td>
<td>104 Taylor Street Soccer and Fitness Development</td>
<td>D</td>
<td>$1,000,000</td>
<td>City of Trenton</td>
</tr>
<tr>
<td>2019</td>
<td>North Rainier Park Development</td>
<td>D</td>
<td>$1,000,000</td>
<td>Seattle Parks and Recreation</td>
</tr>
</tbody>
</table>
### Appendix D. ORLP Selected Projects that did not reach a grant agreement

<table>
<thead>
<tr>
<th>Project Year</th>
<th>Project Name</th>
<th>Project Type*</th>
<th>Amount Funded</th>
<th>Project Lead Agency</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>Youth Campground Improvements in Gwynns Falls Leakin Park</td>
<td>R</td>
<td>$750,000</td>
<td>City of Baltimore, MD</td>
<td>MD</td>
</tr>
<tr>
<td>2015</td>
<td>Enota Park Development</td>
<td>D</td>
<td>$600,000</td>
<td>City of Atlanta, GA</td>
<td>GA</td>
</tr>
<tr>
<td>2015</td>
<td>Sparta Court Soccer Fields</td>
<td>A</td>
<td>$450,000</td>
<td>St. Louis Co. Port Authority (Wellston)</td>
<td>MO</td>
</tr>
<tr>
<td>2017</td>
<td>Portland Landing Park Development Project</td>
<td>D</td>
<td>$750,000</td>
<td>The City of Portland</td>
<td>ME</td>
</tr>
<tr>
<td>2017</td>
<td>Douglass Park Redevelopment</td>
<td>R</td>
<td>$485,000</td>
<td>The City of Memphis</td>
<td>TN</td>
</tr>
<tr>
<td>2019</td>
<td>Middle Branch Park Trail and Water Access</td>
<td>D</td>
<td>$1,000,000</td>
<td>City of Baltimore</td>
<td>MD</td>
</tr>
<tr>
<td>2019</td>
<td>Battle Park Renovation</td>
<td>R</td>
<td>$500,000</td>
<td>City of Rocky Mount</td>
<td>NC</td>
</tr>
<tr>
<td>2019</td>
<td>Whitman Park Improvement and Expansion</td>
<td>R</td>
<td>$1,000,000</td>
<td>Camden County</td>
<td>NJ</td>
</tr>
<tr>
<td>2019</td>
<td>Extending the Kinnickinnic River Oak Leaf Trail to High Needs Areas</td>
<td>R</td>
<td>$453,954</td>
<td>City of Milwaukee</td>
<td>WI</td>
</tr>
</tbody>
</table>

* R = Renovation, D = Development, A = Acquisition
Citations


11. Lincoln R. Larson, Zhenzhen


