

Realizing Park Equity

An Evaluation of the National Park Service's Outdoor Recreation Legacy Partnership Program

Ariana Hernandez and Kitty Craig



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As a land grant institution, the Luskin Center for Innovation at UCLA acknowledges the Gabrielino and Tongva peoples as the traditional land caretakers of Tovaangar (Los Angeles basin, Southern Channel Islands) and that their displacement has enabled the flourishing of UCLA.

Disclaimer

The views expressed herein are those of the authors and not necessarily those of the University of California, Los Angeles or The Wilderness Society as a whole. The authors alone are responsible for the content of this report.

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EXECUTIVE SUMMARY

AS CITIES BECOME more densely populated, urban green spaces and outdoor recreation have become increasingly important.¹ Urban parks perform multiple services and provide a variety of benefits for urban dwellers, especially during times of crisis like urban heat events and the COVID-19 pandemic. However, studies have shown that high-quality 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, Eldridge et al. 2019).

In this brief, we study the Outdoor Recreation Legacy Partnership (ORLP) program to better understand whether the program is addressing this issue by meeting its intended goals of providing funding to urban, park-poor and economically disadvantaged communities. Our findings highlight the success of the ORLP program in providing funding to over 70 communities since 2014 (Figure 1) while also identifying opportunities to improve the program at the federal, state and local levels. We interviewed key stakeholders to better understand their experiences administering, implementing and applying for the ORLP program. Additionally, we conducted a spatial analysis to determine the extent to which ORLP funding is going toward communities that are park poor and have been historically socioeconomically disadvantaged.

Our main findings are:

1. State liaison agencies and ORLP applicants appreciate the dedicated funding to urban, park-poor communities.
2. The ORLP program is funding projects in socioeconomically disadvantaged communities.



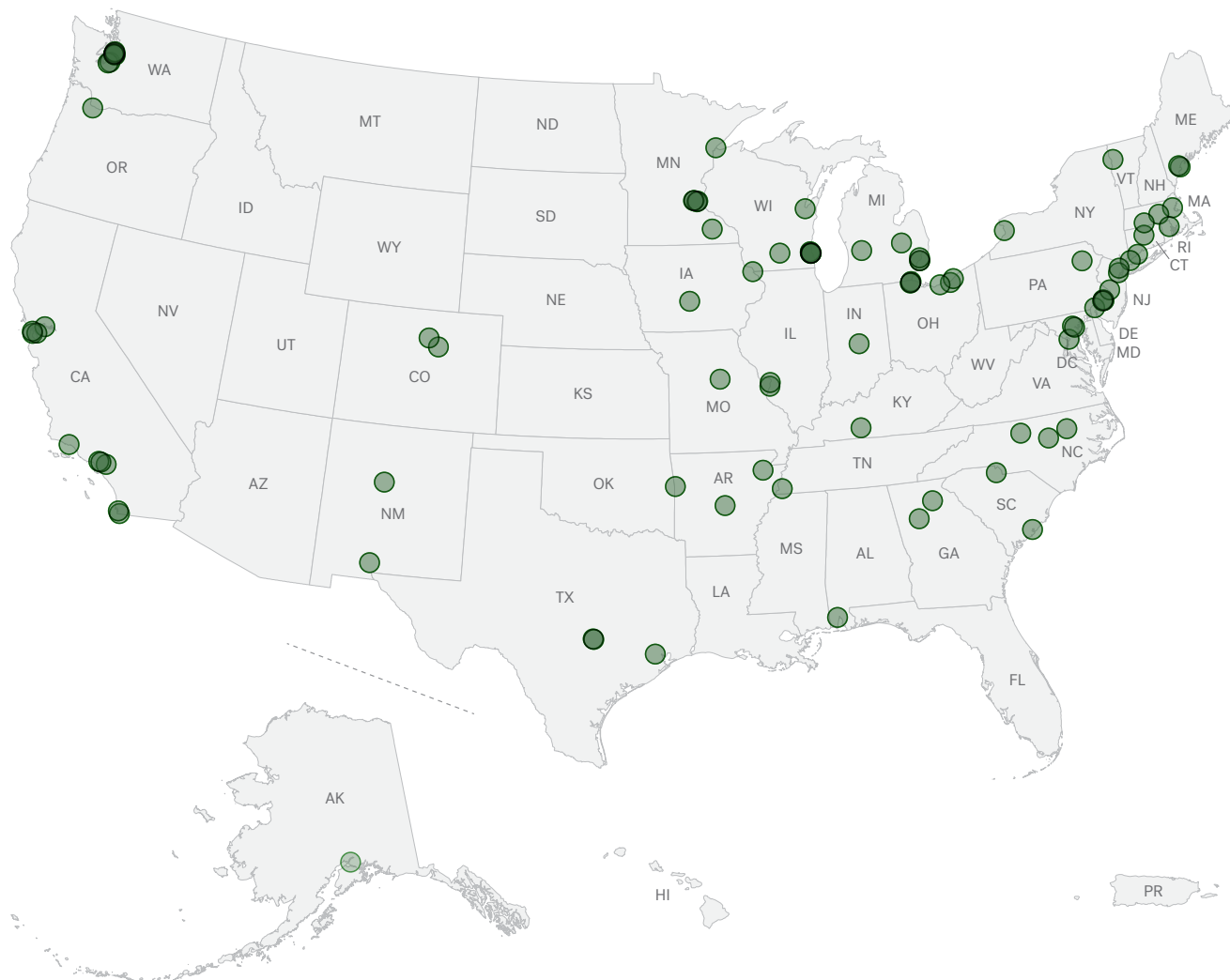
Photo credit: National Park Service

3. Shifting ORLP timelines, priorities and grant guidelines make administering the program at the federal, state and local levels challenging.
4. All levels of government are experiencing staff capacity issues that hinder the effectiveness of the ORLP program in being streamlined and timely.
5. Despite difficulty with the application window, state liaison officers and ORLP applicants largely appreciate the two-phase application process.
6. Programmatic elements of the ORLP program such as matching grant requirements and lack of targeted technical assistance tools can be barriers to program participation.

Based on our findings, we recommend that:

1. The National Park Service (NPS) should create more consistent and predictable application timelines and, evaluation and eligibility criteria for the ORLP program.
2. State liaison agencies and local governments should develop tools to assess park equity and need to target ORLP funds to park-poor communities.

Figure 1: Preselected outdoor recreation legacy partnership projects (2014–21)



Map by The Wilderness Society

3. The National Park Service and park advocates should provide technical assistance to state liaison agencies and eligible applicants throughout the application process and life cycle of the grant period.
4. The National Park Service should facilitate more consistent and transparent communication between the state liaison agencies and ORLP applicants at all stages of the process.
5. Congress and the National Park Service should work to secure administrative funding for increased staff capacity to support

Land and Water Conservation Fund (LWCF) implementation at the federal and state levels.

6. Congress should work with the administration and advocates on a legislative solution to the LWCF match requirement and codify the ORLP program to create more consistent program parameters.
7. The National Park Service and park equity advocates should conduct further research on how to address programmatic barriers such as the “in-perpetuity” requirement and application obstacles for tribes.

INTRODUCTION

IN 2014, THE U.S. CONGRESS requested that the National Park Service (NPS) better serve the outdoor and recreational needs of underserved urban communities through the development of a nationally competitive grant program utilizing Land and Water Conservation Fund (LWCF) funding. In response, the NPS established the Outdoor Recreation Legacy Partnership (ORLP) program to prioritize projects in economically disadvantaged and park-poor areas (NPS 2022).² The ORLP program is the only federal grant program that specifically targets funding toward urban parks. At the time of this research, NPS conducted five grant rounds and invited over 90 project sponsors nationwide to submit a final application for their project,³ distributing \$100 million in federal funding to more than 70 communities (Figure 1).

While the ORLP program has supported important projects across the country, it has been only partially successful in distributing funding, leaving uncommitted an average of 29% of available funds in the first five grant cycles (See Table 1). With additional appropriations expected for this program — especially in support of the Biden administration’s Justice40 Initiative⁴ — 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 deliver on the promise of the ORLP program.

Manhattan Marsh Preserve Metropark, Toledo
Photo credit: Alex Goetz





OBJECTIVES

CONDUCTED BY the UCLA Luskin Center for Innovation and The Wilderness Society's Urban to Wild Program, the broader study evaluated the effectiveness of the Outdoor Recreation Legacy Partnership (ORLP) program, which is administered by the NPS in partnership with state agencies. This research specifically explores the following questions:

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

The results of this study can be used to improve ORLP program design, administration and implementation. This research can inform solutions the NPS and park equity advocates advance to ensure more equitable access to outdoor recreation for disadvantaged urban communities across the country.

This briefing paper provides an overview of the research approach, key findings and policy recommendations. For more details, see the [full report](#). We note, however, that this briefing paper includes quantitative analysis that includes the 2021 (fifth) ORLP grant cycle, whereas the full technical report was published prior to NPS's announcement of the fifth ORLP grant awards. To date, no formal evaluation of the ORLP program has been conducted.

APPROACH

RESEARCHERS USED a mixed-methods approach utilizing both qualitative and quantitative analysis tools. The qualitative aspect of the research included 22 semi-structured interviews with key stakeholders that provided a holistic picture of the ORLP grant application and award process.⁵ 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.

The researchers interviewed NPS staff to understand the requirements and limitations of the ORLP program, the ORLP evaluation process and the role of the merit review panel. Researchers interviewed state officials who administer the LWCF program to understand why some states are successful or not in obtaining funding and associated barriers for participation in the program. The researchers interviewed ORLP awardees to understand the qualities of projects, the environmental and cultural review process, and related application challenges. Lastly, the researchers interviewed park equity advocates to gain insight on advocacy efforts around the ORLP program and potential program improvements.

The quantitative analysis consisted of descriptive statistical and spatial analysis to better understand the socioeconomic characteristics

Overall, ORLP projects are benefiting communities that have been historically underserved in terms of socioeconomic characteristics.

of the census tracts where ORLP projects are located. To create the parameters for defining “underserved populations,”⁶ researchers drew from a variety of sources⁷ and determined that a community is vulnerable to being “park poor” or has been historically underserved if they are:

Within a majority nonwhite 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 lives below the federal poverty level (ACS 2020); and/or
- ▶ 15% or more of the census tract lives in limited English-speaking households (OEHHA 2022).

Researchers used census tract data from the U.S. Census Bureau⁸ and Trust for Public Land’s ParkEvaluator™ tool⁹ within ParkServe¹⁰ to determine if the ORLP program is fulfilling its intended purpose of providing parks to park-poor and economically disadvantaged communities. Researchers relied on a measure of the number of parks within a ten-minute walking distance and socioeconomic data to assess whether the ORLP projects are within an underserved community.¹¹

FINDINGS

1. State liaison agencies¹² and ORLP applicants appreciate the dedicated funding to urban, park-poor communities.

Overwhelmingly, state liaison officers and ORLP applicants communicated their appreciation for the ORLP program as the only federal program that dedicates funding toward economically disadvantaged, park-poor, urban areas. Agencies and applicants specifically appreciated the opportunity to secure larger grants than are available through the LWCF Stateside programs,¹³ due to the high cost of urban park projects. Many interviewees said funding acquisition projects proved challenging because the cost of land is more expensive and scarcer in urban areas. Therefore, interviewees appreciated being able to use ORLP funding for renovating existing parks.¹⁴

Additionally, the ORLP program has received larger appropriations each grant cycle, adding to its success. As depicted in Table 1, in the first grant cycle (fiscal year 2014) Congress

appropriated \$3 million toward ORLP funding, whereas in the fifth grant cycle (fiscal year 2021), Congress appropriated \$125 million, providing more funding for projects across the country.

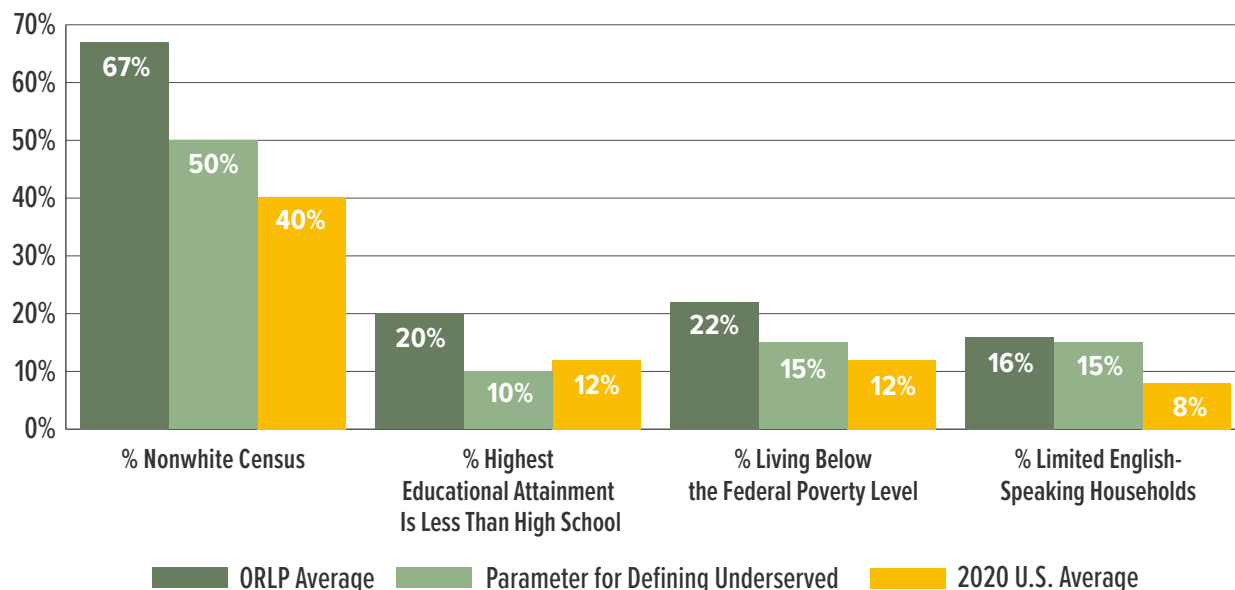
2. The ORLP program is funding projects in socioeconomically disadvantaged communities.

Researchers reviewed the racial/ethnic, education attainment, poverty level and linguistic isolation characteristics of the given census tracts preselected by NPS for ORLP funding, depicted in Figure 2. Please review Table 3 in the Appendix for detailed information. Overall, ORLP projects are benefiting communities that have been historically underserved in terms of socioeconomic characteristics. ORLP funds have generally been directed to census tracts that on average are majority people of color, have high populations of adults 25 years and older who have obtained less than a high school degree, high percentage of people living in

Table 1: ORLP funding summary (fiscal years 2014–21)

Fiscal Year	Amount NPS Awarded	Amount Appropriated	Unspent Appropriation for Fiscal Year (%) ¹⁵	Number of Projects
2014	\$2,631,833	\$3,000,000	12.27%	7
2015	Combined with fiscal year 2016	\$3,000,000	—	—
2016	\$13,381,153	\$12,000,000	10.79%	22
2017	\$11,697,715	\$12,000,000	2.52%	18
2018	Combined with fiscal year 2019	\$20,000,000	—	—
2019	\$16,887,300	\$20,000,000	57.78%	19
2020	Combined with fiscal year 2021	\$25,000,000	—	—
2021	\$61,100,000	\$125,000,000	59.30%	27
Average	\$21,139,600	\$44,000,000	28.50%	18.6
Total	\$105,698,001	\$220,000,000	—	93

Figure 2: Socioeconomic characteristics of ORLP-funded census tracts



poverty, and are relatively linguistically isolated. However, it should be noted that NPS requires ORLP applicants to provide only the poverty level¹⁶ of the community the park will serve and how the community is underserved in terms of access to parks. Other characteristics, like linguistic isolation, race/ethnicity and high school educational attainment can be used to bolster project applications but are not part of the current evaluation criteria.

In addition to reviewing socioeconomic characteristics, researchers investigated how many existing parks are within a 10-minute walk of an ORLP project using TPL’s ParkServe database (TPL 2022). As detailed in Table 2, most ORLP projects (43%) are within a 10-minute walk of 1-3 existing parks and nearly a quarter of ORLP projects are within a 10-minute walk of no existing parks. This indicates that most ORLP projects are within communities that likely need additional outdoor recreation opportunities. Based simply on the number of existing parks in the nearby vicinity, 66.7% of ORLP project awards are benefiting high-need, park-poor communities. However, without further information or analysis on the population density, park acreage, and

Table 2: Number of parks within a 10-minute walk (MW) of ORLP-selected project¹⁷

Number of Parks Within 10MW	Count	Percent
0	22	23.7%
1-3	40	43.0%
4-6	21	22.6%
7+	9	9.7%
Total	92	—

other qualitative aspects of existing parks, it is difficult to determine the level of need these communities face in terms of access to high-quality parks.

3. Shifting ORLP timelines, priorities and grant guidelines makes administering the program at the federal, state and local levels challenging.

The ORLP program parameters, deadlines and guidelines have been modified each grant cycle for various reasons, making it challenging for applicants and administrators to manage expectations and feel adequately prepared for

each grant round. When the Notice of Funding Opportunity (NOFO) changes slightly each grant cycle, including elements such as eligibility requirements and definitions for “underserved,” state liaison agencies need to quickly adapt to ensure they submit eligible and high-quality projects to the NPS. With changing guidelines each grant cycle, state liaison agencies must spend additional time understanding the intent of the NOFO to adequately provide technical assistance and outreach to communities.

On a positive note, the NPS has had the discretion to modify the NOFO based on what is learned each grant cycle as well as administration priorities. Interviewees indicated that while shifting program parameters can be challenging, many understood that the NOFO was meant to be flexible so that NPS or the Department of Interior could improve upon, redefine or pivot in the definition for “underserved” or “park poor” and other necessary updates. For example, the Trump administration highlighted job development and creation in the ORLP application, while the Biden administration has highlighted climate and nature-based solutions in the most current ORLP grant cycle.

State liaison agencies with varying levels of experience with the ORLP program expressed that the timeline to apply for a new outdoor recreation project or redevelopment of an existing outdoor recreation project was challenging based on the NPS’s narrow application window. SLOs felt that from the time the NOFO is released to when the initial application is due is too short to effectively solicit applications, provide feedback and acquire the required 50% match funding. In addition to the narrow application window, the ORLP grant-making process has not had consistent timelines.¹⁸ Interviewees found it difficult to proactively plan ORLP projects without knowing when the NOFO would be released and the

following application timeline as well as the changing eligibility requirements and definitions.

ORLP applicants stated they had challenges with the long and uncertain timeline between preselection to finalization of a grant agreement. Some interviewees said they had challenges holding onto their 50% match while waiting for the NPS funding notification. NPS often has been late to notify applicants if they have reached a grant agreement, which delays the ORLP applicant from beginning construction.

However, a challenge for NPS is that applicants can often be late to submit their final ORLP application to reach a grant agreement. The final ORLP application requires ORLP applicants to have completed the necessary environmental and cultural reviews (National Environmental Policy Act and Section 106 of the National Historic Preservation Act). NPS must communicate through the SLOs to the ORLP applicant to receive the final application materials, which can delay the process. However, with the most updated NOFO, there is no longer a two-part application process so ORLP applicants must complete the environmental and cultural reviews in their initial application (NPS 2022).

4. All levels of government are experiencing staff capacity issues that hinder the effectiveness of the ORLP program in being streamlined and timely.

Interviewees recognized that the historic – and now guaranteed – investment of full funding (\$900 million) in the LWCF is an incredible opportunity to invest in outdoor recreation and conservation across the country, but many acknowledged that staff capacity is challenged to meet grant-making demands, including long-term stewardship and monitoring of the growing number of LWCF projects. Staffing challenges with the LWCF Stateside program impact the ORLP grant-making process given the time-intensive nature of the program and the fact

that the same staff usually administer both programs. Although Congress has increased appropriations for the ORLP program each grant cycle (see Table 1), the number of SLOs has not necessarily increased. Many successful state liaison agencies indicated they had at least three staff people dedicated to administering LWCF Stateside grants as well as ORLP. Some state liaison agencies said ORLP is challenging to apply to because they had only one state liaison officer dedicated to LWCF applications among other obligations. Many felt that they simply did not have capacity to effectively administer ORLP because of existing demands of the (already challenging) LWCF Stateside program.

Staffing challenges also pose barriers at the local level, with interviewees acknowledging that full-time grant-writing staff is often needed to successfully navigate the ORLP process due to the complexity of the federal grant. Underserved communities often do not have the resources or staff to begin applying to competitive grant programs let alone operate and maintain the projects after initial construction (Callahan et al. 2021). Many state liaison agencies indicated that the competitive, complex nature of the grant deterred some urban areas from applying. These areas felt that ORLP is a grant-writing competition that they were not equipped to commit limited staff resources. However, we found in our interviews that many (not all) smaller urban areas have some level of 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.

Like the state liaison officers, NPS staffing has not increased fast enough to meet the historic administrative challenge of full funding for LWCF and increased ORLP appropriations and, in turn, increased project applications. Without adequate staffing at the federal level, NPS has often been

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.

unable to review the initial applications in a timely manner and meet its proposed timelines. While NPS has added more ORLP-focused staff as the program has matured (which many ORLP applicants noted significantly improved communications with NPS since that investment), NPS still faces staff capacity issues that can delay communications with the state liaison agencies and review of ORLP applications. Interviewees – many who have been administering LWCF for more than a decade – also indicated changes in NPS staffing structure and to more centralized decision-making in Washington, D.C., and reduction of regional staff as a challenge and bottleneck. Interviewees indicated that more staff capacity and autonomy in decision-making at the regional office level might provide more efficiency.

5. Despite difficulty with the application window, state liaison officers and ORLP applicants largely appreciated the two-phase application process.

The first five ORLP grant cycles were conducted in a two-step application process¹⁹ in which the state liaison agencies worked with potential ORLP applicants on a “pre-application” to submit to NPS. NPS then reviewed the “pre-applications” in terms of eligibility, technical feasibility, and merit. If NPS selected an ORLP applicant to submit a final application, then the applicant



Glass City Metro Park, Toledo | Photo credit: Allen Gallant

was required to conduct an environmental and cultural review process as well as address issues discovered in the pre-application phase. This review required ORLP applicants to comply with the environmental and cultural reviews within the National Environmental Policy Act and Section 106 of the National Historic Preservation Act. Most interview participants appreciated that the ORLP process was conducted in a two-step process, as many economically disadvantaged communities do not have the ability to conduct a federal environmental and cultural review process without the promise of ORLP funds. With land acquisition projects, the two-part process allowed applicants to work through the complex land acquisition process and secure necessary agreements with landowners and then work through the cultural and environmental review process once applicants cleared the first round of application. Despite the difficulty in inconsistent timelines or short application

windows, ORLP applicants felt better prepared to apply to the second stage of the application process using this two-step process. However, in the most updated NOFO, there is no longer a two-part application process, so ORLP applicants must complete the environmental and cultural review in their initial submittal application.²⁰

6. Programmatic elements of the ORLP program such as matching grant requirements and lack of targeted technical assistance tools can be barriers to program participation.

Matching Grant Requirements

The ORLP program is subject to the LWCF Act,²¹ which governs eligibility, project types, and other requirements written into the founding legislation. All LWCF-funded projects, including ORLP projects, require 50% match in nonfederal funding sources. This means that NPS will award



Photo credit: Jeongyeob Choi / Pexels

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 match funding when applying for ORLP funds. The ORLP program is a reimbursement model, therefore the project applicants must incur all the expenses upfront. Many interviewees identified securing the 50% match – and holding onto it over the life cycle of the grant – as one of the most significant barriers for the economically disadvantaged communities ORLP is intended to serve. Larger jurisdictions with access to a variety of sources of match funding and the ability to be nimbler are generally more likely to meet the match requirements of the ORLP grant and successfully navigate the complex grant process. 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. Interviewees shared that awareness and understanding of what can be used as “match funding,” including in-kind donations and other eligible sources, are an opportunity for further training and education for potential applicants.

Preexisting capacity to examine inequities in park and outdoor recreation access

States that have well-resourced LWCF liaison agencies generally have submitted strong ORLP

applications. States that prioritize funding toward park 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 applicants could utilize to demonstrate project eligibility for the ORLP application. For example, California uses the Community Fact Finder tool (California State Parks 2020) and obtained 10 ORLP grants in the five grant cycles and New Jersey uses the Statewide Overburdened Communities Map (NJDEP 2022) and obtained five ORLP grants in the five grant cycles. These agencies assist the applicants in the environmental and cultural review processes. States that have not prioritized parks or outdoor recreation or have less robust natural resource agency infrastructure were limited in staff and resources to properly solicit ORLP applications and provide technical support.

Many successful state liaison agencies have determined potential outdoor recreation and park projects through a Parks Master Plan, the Statewide Comprehensive Outdoor Recreation Plan (SCORP) or other planning documents. Interviewees expressed interest in a national-level tool that could support identification of park-poor or economically disadvantaged communities for local jurisdictions that don’t have access to such analysis.

RECOMMENDATIONS

Recommendation 1: The National Park Service should create more consistent and predictable application timelines and evaluation and eligibility criteria for the ORLP program.

Recommendation 2: State liaison agencies and local governments should develop tools to assess park equity and need to target ORLP funds to park-poor communities.

Recommendation 3: The National Park Service and park advocates should provide technical assistance to state liaison agencies and eligible applicants throughout the application process and life cycle of the grant period.

Recommendation 4: The National Park Service should facilitate more consistent and transparent communication between the state liaison agencies and ORLP applicants at all stages of the process.

Recommendation 5: Congress and the National Park Service should work to secure administrative funding for increased staff capacity to support Land and Water Conservation Fund (LWCF) implementation at the federal and state levels.

Recommendation 6: Congress should work with the administration and advocates on a legislative solution to the LWCF match requirement and codify the ORLP program to create more consistent program parameters.

Recommendation 7: The National Park Service and park equity advocates should conduct further research on how to address programmatic barriers such as the “in-perpetuity” requirement and application obstacles for tribes.

Recommendation 1:

The National Park Service should create more consistent and predictable application timelines and evaluation and eligibility criteria for the ORLP program.²²

State liaison agencies and ORLP grant applicants expressed desire for more consistency and predictability of the ORLP grant program timeline as well as evaluation and eligibility criteria. NPS should allocate more 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, and for ORLP applicants to find a reliable source of matching funds.

NPS should provide clear guidance on when applicants will receive application feedback and when NPS will make award decisions. NPS should institutionalize the grant-making window for this program, providing a consistent and predictable window for application (e.g., January announcement – May application deadline). Interviewees indicated that the Congressional appropriations process has driven inconsistent timing in the past and having ORLP in the president’s budget facilitates more consistent timing.

Many interviewees expressed that the shifting NOFO parameters (such as definitions of underserved in terms of park access, definitions of urban areas, and definitions of economically disadvantaged) from each grant cycle in

conjunction with a short application window created challenges to applying to the ORLP program. Along with a consistent application timeline, the researchers recommend creating consistent program parameters. The most recent NOFO changed the definition of urban areas from a population of 50,000 to 30,000. Many interviewees indicated that this change is appreciated and opens eligibility to more urban areas. The most recent NOFO also provides more specificity regarding the definitions of underserved and economically disadvantaged.²³ The researchers recommend keeping these definitions consistent so that SLOs and ORLP applicants can better prepare ORLP applications in advance.

Recommendation 2:

State liaison agencies and local governments should develop tools to assess park equity and need to target ORLP funds to park-poor communities.

To better reach communities that have the most to gain from ORLP funds, municipalities and parks and recreation agencies should invest in the development of park needs assessment tools that inventory the current level of park access and identify high-need, park-poor communities. At the state level, this analysis can include information to assess which communities have been successful (or not) in securing grant funding to support more equitable grant-making by the state agency. At the local level, this analysis should be based on an inventory of existing park quantity and quality, and then, using metrics the municipality deems fit (e.g., 10-minute walk to park analysis, park acreage per thousand residents metrics, race/ethnicity metrics, income/federal poverty level metrics, etc.), the municipality should determine the level of need. Examples of municipalities that developed park needs assessment tools include Los Angeles

Countywide Parks and Recreation Needs Assessment (2016)²⁴ and the City of Seattle Parks and Open Space Plan (2017).²⁵ These proactive planning efforts help municipalities determine the community's park needs and enable states to submit more competitive ORLP applications. Additionally, ORLP applicants can take advantage of nationally available tools like TPL's ParkServe (TPL 2022).

Successful applicants have often identified ORLP projects through the state liaison agencies' statewide comprehensive outdoor recreation plan (SCORP). Through the LWCF Act, NPS offers planning grants to state liaison agencies to develop a SCORP (DOI 2022). These planning grants can provide an opportunity for all state liaison agencies to use the SCORP process to assess and address statewide park equity needs and potentially develop equity mapping tools to support project applicants. The NPS can work with groups like National Association of State Outdoor Recreation Liaison Officers (NASORLO) or Society of Outdoor Recreation Professionals (SORP) to help develop a peer-learning network to facilitate learning about innovative and equity-centered planning approaches.

Recommendation 3:

The National Park Service and park advocates should provide technical assistance to state liaison agencies and eligible applicants throughout the application process and life cycle of the grant period.

The NPS should provide technical assistance more regularly on the ORLP application process for SLOs to facilitate a better understanding of guidelines and processes. The SLOs can then collaborate with park advocates and other agencies to provide better technical assistance and outreach to eligible urban areas.



Adventure Boardwalk, Toledo | Photo credit: Allen Gallant

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 administrators, like NPS and the SLOs, must adequately “disseminate information” to eligible communities on the program details and resources to support underserved communities (Callahan et al. 2021, p. 64). This recommendation is aligned with the Department of Interior’s Equity Action Plan, which specifically identifies “targeted technical assistance to enhance underserved community ability to apply for grants” as a strategy to increase equity in LWCF funding.²⁶

Many stakeholders suggested more frequent (e.g., quarterly) webinars so NPS could detail its expectations for SLOs and ORLP applications and demystify the process. Another recommendation is to have smaller-scale, regional webinars for ORLP applicants and SLOs to better understand grant guidelines and application issues. The webinars can

explain how the SLOs should conduct outreach and assist potential ORLP applicants. NPS should continue to pursue partnerships with nonprofits, like the City Parks Alliance (CPA),²⁷ NASORLO, TPL, Society of Outdoor Recreation Professionals (SORP) and National Recreation and Park Association (NRPA) to provide technical assistance through webinars and other peer-learning forums and networks and collaboratively develop tools such as checklists and toolkits²⁸ to support the application process. Alongside more technical assistance capacity, the state liaison agencies should work with nonprofit partners, like CPA, NRPA, TPL, SORP, and other professional associations (e.g., American Planning Association) to increase awareness of the ORLP program. Congressional offices could also support information-sharing with district constituents through office communication platforms (e.g., newsletters, town halls, community events, social media). This lack of awareness is keeping underserved communities from applying for ORLP funds.

Recommendation 4:

The National Park Service should facilitate more consistent and transparent communication between the state liaison agencies and ORLP applicants at all stages of the process.

The ORLP application process is often long and complex, and interviewees expressed a need for more transparency and communication among the state liaison agencies, NPS and applicants. By providing more guidance and transparency on what occurs during the review process, ORLP applicants can better manage projects as well as prepare for future applications.

Many interviewees indicated that when NPS did not select their ORLP project for funding consideration, they desired more information about what was missing or why the project was not selected.²⁹ These interviewees often felt they had strong applications that met general program parameters. This research revealed inconsistent feedback loops among the NPS, state liaison agencies and project applicants; some project applicants received timely and helpful feedback to strengthen project proposals, while others did not. Altogether, we recommend more consistent communication among NPS, the SLOs and the ORLP applicants to better administer the ORLP program.

Interviewees expressed a desire for NPS to “lead with yes.” This “lead with yes” mentality includes NPS not rejecting applications for minor issues in the project, but rather connecting with the state liaison agency and/or eligible ORLP applicants to work through fixable issues on projects with merit so that NPS can potentially recommend the project for final review. Again, this requires more staff capacity at the federal and potentially regional level, would likely lengthen NPS’s review processes, and/or may require NPS to



contract this technical assistance capacity to nonprofit partners or other experienced entities. This recommendation aligns with the DOI Equity Action Plan’s priority to improve transparency and technical assistance through activities such as increased grant support to improve awareness and assistance.³⁰

Recommendation 5:

Congress and the National Park Service should work to secure administrative funding for increased staff capacity to support Land and Water Conservation Fund (LWCF) implementation at the federal and state levels.

Full funding of the LWCF presents a historic opportunity to invest in outdoor recreation and conservation across the country that will continue to build on the formidable legacy of the program. The state liaison agencies are a critical partner to the NPS in supporting and implementing the state and local assistance and ORLP programs. State agencies have never received federal funding to support staff administration of LWCF, which has resulted in inconsistent staffing levels across the country.



Photo credit: National Park Service

To effectively administer the LWCF Stateside and ORLP programs, state liaison agencies must have adequate staff—at least two to three full-time staff—dedicated to the programs. Funding solutions include allowing a percentage of the statewide apportionment to be used for state staff or securing funding for state administration through the federal appropriations process.

Interviewees identified limited staff capacity at the federal level as an additional barrier to ORLP administration. As ORLP appropriations increase and the agency funds more projects, more dedicated NPS staff will be required to successfully review applications, administer the program, and communicate with project applicants. Furthermore, interviewees identified centralization of decision-making in Washington, D.C., as a bottleneck for working through project-level issues and expressed the desire for more regional autonomy and staff capacity and decision-making power in NPS regional offices. This report recommends further research into staffing needs at the federal and state levels to successfully administer the ORLP program and LWCF State and Local Assistance Program more broadly, recognizing the increasing caseload of LWCF projects and subsequent burden of ensuring compliance of LWCF-funded projects.

Recommendation 6:

Congress should work with the administration and advocates on a legislative solution to the LWCF match requirement and codify the ORLP program to create more consistent program parameters.

The LWCF Act requires a 50% nonfederal match for all projects, including ORLP grants. This match requirement is consistently identified as a barrier for communities. For ORLP, the 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 they have received the ORLP grant. Since the LWCF Act requires 50% match, a legislative fix is necessary to address the issue. Legislation such as the Outdoors for All Act would allow the secretary of the interior to waive all or part of the match requirement 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). Congress also has the power to designate other federal funding sources as “nonfederal share” through legislation or reauthorization efforts.

As many interviewees stated, the ORLP program is subject to change due to administrative objectives from grant cycle to cycle. While this provides the administration some relative flexibility, it has resulted in inconsistent guidelines and requirements. Many interviewees stated that if the program parameters remained consistent they would not need as much time or preparation at the beginning of the application process. This consistency would allow municipalities and state agencies to prepare for the grant-making process in

advance rather than waiting for NPS to release the new NOFO. Congress has the power to codify the ORLP program through legislation such as the Outdoors for All Act, which could address the match requirement and establish important program parameters such as program eligibility and definition of key terms such as “underserved” and “disadvantaged” community.

Recommendation 7:

The National Park Service and park equity advocates should conduct further research on how to address programmatic barriers such as the “in-perpetuity” requirement and application obstacles for tribes.

This research revealed many barriers and challenges to the ORLP program that relate to the LWCF Act and State and Local Assistance Program more broadly. These challenges included the “in-perpetuity” requirement, and tribal engagement³¹ in the LWCF program.

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. Many state liaison agencies that we interviewed stated this was a barrier because they did not have adequate staff to conduct compliance checks or the funding to add staff. The conversion process requires approval from the National Park Service and a substitute recreation property of at least equal fair market value and of reasonably equivalent usefulness and location (DOI 2022). Further, many state liaison agencies and ORLP applicants stated that having to maintain a park in perpetuity is sometimes not feasible due to political obligations/struggles or the financial burden and therefore deters applicants from applying for LWCF funds. However, not all stakeholders

agreed that the “in perpetuity” requirement should be updated, as many appreciated the protection of public land forever. Some interviewees pointed to the fact that LWCF funding is derived from fossil fuel extraction and is meant to counter the perpetual harm by maintaining the projects in perpetuity (DOI 2022). Further research should explore the “in perpetuity” requirement, as it relates to the ORLP program, to better understand the needs of urban communities and the state liaison agencies and potential solutions that maintain the integrity of the LWCF program but allow for administrative discretion.

Lastly, this report was not able to touch on the tribal involvement of the ORLP program due to time and research limitations. However, we urge further research into how the LWCF Stateside and ORLP program can be better adapted to meet the needs of tribal communities. 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 its Equity Action Plan in 2022, which details how DOI programs, like LWCF and ORLP, can better engage tribal communities and address previous inequities.³² DOI and NPS should continue their research into engagement strategies for tribal communities to promote equitable planning practices and grant-making practices aligned with the federal trust relationship between the federal government and tribal nations.



Photo credit: National Park Service

CONCLUSION

THE ORLP PROGRAM is a highly valued and much-needed federal source of funding for urban parks across the United States. As cities across the country face growth pressures and mounting climate change impacts, protection and revitalization of local parks – especially those in park-poor communities – are critical to ensure more resilient, livable and equitable communities. The ORLP program is positioned to be an increasingly important program as the Biden administration continues to prioritize equity through the Justice40 Initiative and invest

in the America the Beautiful Initiative. Congress also has the unique opportunity to codify the ORLP program through legislative vehicles such as the Outdoors for All Act (SB 2887) as well as support the program – and NPS administration – through the appropriations process. Congress, the 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 realize park equity across the United States.

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APPENDIX

Table 3: Socioeconomic characteristics of ORLP-funded census tracts

	Round 1	Round 2	Round 3	Round 4	Round 5	Total	U.S. Average
Total Population	25,298	72,021	63,208	56,896	96,714	314,137	326,569,308
White Alone (NH)	34.0%	31.3%	25.6%	32.0%	33.5%	31.2%	60.1%
Non-White	66.0%	68.7%	74.4%	68.0%	66.5%	66.7%	39.9%
Population 25 Years and Over:	18,042	47,628	39,308	38,364	64,846	208,188	222,836,834
Less Than High School	12.3%	20.8%	28.5%	20.0%	16.2%	20.2%	11.5%
Greater Than a High School Degree	73.4%	74.7%	71.5%	80.0%	83.9%	77.6%	88.5%
Population Age 18 to 64 for Whom Poverty Status Is Determined:	17,171	45,398	38,542	34,321	60,772	196,204	195,426,211
Living in Poverty	10.8%	19.6%	30.4%	25.0%	17.9%	21.7%	12.1%
At or Above Poverty Level	74.9%	75.8%	69.6%	75.0%	82.1%	76.1%	88.0%
Language Spoken at Home for the Population 5 Years and Over	24,056	66,791	58,380	53,414	90,244	292,885	306,919,116
Speak Only English	61.4%	66.0%	64.2%	71.4%	63.1%	65.6%	78.5%
Speak English “Very Well”	13.6%	16.1%	16.2%	14.8%	19.9%	16.8%	13.3%
Speak English Less Than “Very Well”	10.8%	13.3%	19.6%	13.8%	17.0%	15.5%	8.2%

ENDNOTES

- ¹ See a U.S. Cities Factsheet from the University of Michigan Center for Sustainable Systems for more information on the rate of urbanization and the effects of urbanization on the natural environment. Please see: <https://css.umich.edu/publications/factsheets/built-environment/us-cities-factsheet>
- ² Since this research was conducted, NPS released the sixth Notice of Funding Opportunity, which changed the population parameters to communities that “are located within or abutting an incorporated city (or town) having a population of 30,000 or more” (NPS 2022).
- ³ In the first five grant cycles, 93 projects have been selected to submit a final application. For this study, researchers utilized 92 ORLP projects. (Note: One project in the most recent grant cycle has not determined the physical location of the park. Therefore, researchers could not determine the census tract or the 10-minute walk analysis.) Furthermore, nine projects did not reach a grant agreement. For more information, see Making Park Equity Real: An Evaluation of the Outdoor Recreation Legacy Partnership Program.
- ⁴ Please see: <https://www.whitehouse.gov/environmentaljustice/justice40/> for more information on the Justice40 Initiative
- ⁵ Please see the [full report](#) for the list of stakeholders that the researchers interviewed.
- ⁶ Researchers for this report determined these metrics utilizing the previously discussed tools and literature since there are no current, agreed-upon tools that specifically address park poverty using sociodemographic characteristics. The National Park Service uses a technical and merit review panel to determine whether the ORLP applicant is fulfilling the intended purpose of the program. In the most updated Notice of Funding Opportunity, NPS defines “economically disadvantaged” as a community “that has a poverty rate of at least 20% or that is at least 10 percentage points higher than that of the project city, county, and state rates” (NPS 2022).
- ⁷ 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 2020 ACS 5-year estimates.
- ⁸ Researchers utilized the following census tract level tables from the 2020 American Community Survey (ACS) 5-year Estimates: A00001: Total Population, A04001: Hispanic or Latino by Race, A13003B: Poverty Status in 2020 for Population 18-64, A12001: Educational Attainment for Population 25 Years and Over, and C16001: Language Spoken At Home For The Population 5 Years And Over. Please see Figure 1 for results.
- ⁹ For a proposed park, the ParkEvaluator produces a report showing the impact of a new park, including the total number of people within a 10-minute walk of the park, and their age, household income, and race/ethnicity. It also shows the number of people served by the new park alone, who otherwise do not live within a 10-minute walk of a park. For this project, researchers only utilized the number of existing parks within a 10-minute walk of the ORLP-funded project to determine if this park was going to communities with little to no existing parks.

- ¹⁰ Trust for Public Land (TPL) created ParkServe (www.tpl.org/parkserve), a freely available online database of parks across the United States. As a comprehensive mapping platform, it identifies areas within a 10-minute walk of a park, highlights priority areas for new parks, and allows users to overlay additional demographic, environmental, and health data, and the presence of urban heat islands and public schools.. ParkEvaluator™ is a feature within ParkServe that generates a 10-minute walkable service area around a potential park and compiles demographic information for the population within that service area.
- ¹¹ In the most updated NOFO, NPS defines a park desert as a community with “(1) no existing parks within a .5-mile radius of the community(ies) to be served by the park (not the radius of the proposed park); or (2) one or two small parks within a .5-mile radius of the community(ies) that is/are not large enough to support the size of the population of the service area, or otherwise unable to provide a variety of recreational opportunities; or (3) one or two existing parks (potentially of adequate size), including the park that is being addressed in this project, that is/are so obsolete or underdeveloped that a major redevelopment or rehabilitation is necessary to be able 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; or (4) existing parks that are inaccessible to the target community due to physical barriers such as transportation infrastructure, rivers, etc.” (NPS 2022).
- ¹² The state officials who administer LWCF Stateside programs are known as state liaison officers (SLOs) and work for state liaison agencies, which vary depending on state natural resource agency structures. These agencies are charged with distributing the allocation of LWCF funding that is annually distributed to states based on a national funding formula. For more information, visit the National Association of State Outdoor Recreation Liaison Officers (NASORLO) website: <https://www.nasorlo.org/>. NASORLO is an organization that represents the states and territories and is a liaison to the NPS in the administration of LWCF in funding outdoor recreation at the state and local government level.
- ¹³ It should be noted that there is not one centralized database that details granting levels of LWCF Stateside grant programs. With greater LWCF funding, some states are revisiting granting maximum and minimums, generally increasing grant amounts. Please see: <https://www.everycrsreport.com/reports/RL33531.html> for more information on the LWCF Act.
- ¹⁴ Approximately half of ORLP projects in the five grant cycles were renovation projects.
- ¹⁵ Unspent appropriations roll over to the next fiscal year
- ¹⁶ In the first two grant cycles, NPS evaluated racial/ethnic demographics for the ORLP applications, but the Trump administration removed that criteria of review to focus on economically disadvantaged characteristics.
- ¹⁷ It should be noted that 45 of the 92 projects this research investigates are renovation projects. To account for existing parks that were renovation projects, researchers removed the renovation project from TPL’s 10-minute walk calculation to calculate the number of existing parks without double counting the existing park.

- ¹⁸ The amount of time it takes NPS to review the proposals and announce selected projects is variable and can change from grant cycle to grant cycle. Currently, there is no estimated duration for the ORLP application steps.
- ¹⁹ Please see the final report for more details on the two-phase application process.
- ²⁰ Please see: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=342812>
- ²¹ Please see: <https://www.everycrsreport.com/reports/RL33531.html> for more information on the LWCF Act.
- ²² Researchers initially interviewed ORLP stakeholders before the sixth NOFO was released. This NOFO provides more definition around what an underserved community is in terms of access to parks and gives applicants more time to apply to the ORLP grant than previous grant cycles, which is aligned with this recommendation. However, all the application materials are now required in the first phase of the ORLP grant. The most recent NOFO may be found at: <https://www.grants.gov/web/grants/view-opportunity.html?oppld=342812>
- ²³ Please see endnotes 6 and 11 for the current definitions of economically disadvantaged and underserved in terms of access to parks.
- ²⁴ Please see: <https://lacountyparkneeds.org/>
- ²⁵ Please see: <https://www.seattle.gov/documents/Departments/ParksAndRecreation/PoliciesPlanning/2017Plan/2017ParksandOpenSpacePlanFinal.pdf>
- ²⁶ DOI Equity Action Plan, p. 20.
- ²⁷ 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 and NPS
- ²⁸ Please see the Trust for Public Land's ORLP Program Grant Application Toolkit (<https://www.tpl.org/resource/orlp-grant-toolkit>) as a recent example.
- ²⁹ In the fifth ORLP grant cycle, NPS provided feedback to the ORLP applicants who had not been invited to submit a final application. The researchers conducted the interviews prior to the fifth ORLP cycle.
- ³⁰ DOI Equity Action Plan, p. 16.
- ³¹ According to the National Congress of American Indians, less than 1 percent of LWCF grants between 1965 and 2016 were awarded to tribal nations. Tribal nations are often unable to secure LWCF funding due to program requirements like matching fund requirements and being forced to compete with better-funded local governments and to navigate levels of bureaucracy that may run counter to the federal trust relationship.
- ³² Please see: <https://www.doi.gov/sites/doi.gov/files/eo13985-02-10-2022-doi-equity-action-plan-final-with-cover.pdf> for the full DOI Equity Action Plan.

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