



NASORLO Position on Park Project Funds For Urban Communities

December 8, 2016

Across the country, park and public lands are a source of recreation, respite and refuge – especially important in urban areas. NASORLO deems a nationwide system of parks composed of places at the local level – town, city and county parks – with state parks and national parks are vital to our nation's fabric. Working with our partners, NPS and Congress we envision a fortified LWCF Program that includes an urban component.

NASORLO supports dedicated federal funding for local and urban outdoor recreation projects that are consistent with each states' Statewide Comprehensive Outdoor Recreation Plan (SCORP). SCORPS, and other valuable information, are key in informing and guiding investments that meet each state's specific public outdoor recreation needs.

NASORLO has learned from CPA and NRPA that cities prefer to receive grant funding directly from the federal government. S. 1995 would codify how the ORLP Program is currently administered by NPS, which as structured today, does not make direct grants to cities. As it is written, NASORLO does not support S. 1995. The following points highlight shortcomings in the ORLP Program.

- 1) Reduces GOMESA assistance for LWCF stateside program investments that will be apportioned to every state. States gear investments that meet the highest and best needs in outdoor recreation, including those in urban areas. A reduction in GOMESA, coupled with the unpredictable regular LWCF apportionments, will further reduce state ability to make meaningful grant awards to local communities.
- 2) Draws down GOMESA from states directing the funds to urban areas with no guarantee that an urban area in every state will be a beneficiary.
- 3) Under ORLP, as currently administered, a maximum of 2 proposed projects per state may advance to NPS. States have no role in ranking or the final project selection. Note: ORLP 2016 grant proposals were due to NPS April 29th though no final award announcement has been made as of December 5th.
- 4) All urban project finalists are selected by NPS. LWCF State Liaison Officers are not invited to participate. SLOs and ASLOs, with our staff, are lead authorities regarding individual state's needs and have relationships with municipalities of all sizes.
- 5) NASORLO understands that cities prefer direct grants from the Federal Government.
 - a. Selected project awardees will have a direct relationship with their state for project completion, project billings, and perpetual stewardship compliance.
 - b. Under S.1995, funds are not granted directly to cities, rather are passed through states to cities. The unfunded UPARR program makes grants directly to cities
- 6) States will carry the financial burden to reimburse urban project sponsors. States, in turn, are reimbursed by NPS.

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- 7) State LWCF Liaison Officers will have responsibility for federal programmatic compliance and oversight yet no administrative funding to do so.
- 8) There are examples of projects that are not eligible for or ready for ORLP fund assistance, yet have moved forward. An urban project selected by NPS in 2014, has proven problematic. The city and NPS have not signed a Project Agreement (funding contract and scope of work) yet the same city advanced into the 2016 cycle for a new project. In 2015, according to NPS approximately 15 projects may not be eligible or not implementation ready.
- 9) Urban issues and needs are addressed state by state in State Comprehensive Outdoor Recreation Plans (SCORP). Implementation actions vary by state and are distinctively and uniquely addressed by policy, funding and special initiatives. States do address urban funding needs with percentage set asides for urban areas of certain sizes and population priority score factors. Grants over \$250K favor urban projects.

Recommendations:

- A. If ORLP were to be codified, NASORLO recommends it be accomplished through the existing LWCF State Assistance Program. In this scenario, ORLP's implementation will follow all protocols, reviews and requirements of an established program. [Note: Due to limited staff resources, NPS Washington Office is challenged at best to manage ORLP.] This approach will result in the following: direct funds to urban areas in every state; eliminate competition among cities nationwide; States will more quickly and efficiently award grant funds to the urban areas that have the greatest public outdoor recreation needs – either new facilities that meet changing/growing demand or rehabilitate existing facilities; due to the on-going State-City relationships, States can effectively recognize project readiness for grant funding; and allow States to recuperate grant administration costs.
- B. The existing UPARR Program, while not funded in many years, would directly award grants to cities from the federal government. There is no administrative cost to states and there is a direct relationship between Interior and city government. NASORLO supports this approach as an ORLP alternative with appropriations by Congress outside of an earmark on GOMESA. An earmark on GOMESA, like that proposed in S.1955, would further diminish states' abilities to direct funds to communities with the greatest park and outdoor recreation needs.