



August 7, 2024

Christine Cochetoux
The New York City Department of Parks & Recreation
The Arsenal, Central Park
830 Fifth Avenue
New York, NY 10065

Dear Ms. Cochetoux,

I run South Bronx United (SBU), a 501(c)3 nonprofit, charitable organization that serves more than 1,700 youth and families from the South Bronx through recreation, academic enrichment, college prep, mentoring, workforce development, immigration legal services, and social work supports. I have led the organization since founding SBU fifteen years ago. Our programs reach youth in the city's highest poverty neighborhoods. Over 85% of our participants are considered low-income. We fundraise nearly our entire budget collecting only minimal fees from families. No young person is ever turned away due to finances and most of our programs are completed free. We fundraise more than 90% of our annual budget through the philanthropic support of individuals, corporations, and foundations in addition to limited city, state, and federal funding.

I am writing on behalf to express our concern about the New York City Department of Parks & Recreation proposed rules change (revisions to section § 2-09 and 2-12 of Chapter 2, Title 56). **While we applaud the department's intention to increase equitable access, we are concerned with two sections will in fact negatively affect access for hundreds, perhaps thousands, of vulnerable children and youth like the ones we serve in the South Bronx by decreasing the ability of organizations like ours to retain permits.**

The two areas of concern are:

1. The proposed cap of "32 per week on all approved permits for the relevant season, unless otherwise approved by the Citywide Athletic Permit Coordinator."¹
2. The proposed differentiation between and prioritizing of game over practice permits.²

First, the proposed weekly cap does not appear to differentiate between the hours for single field permits and the hours for multi-field permits. In the South Bronx, we utilize multiple fields to provide programming to more youth, with certain sites serving various underserved populations like low-income youth, unaccompanied immigrant children, and girls. Taken together, these

¹ Proposed language in §2-12 (c)(10): "The maximum number of renewal hours that any person or entity holding a permit may have is 32 per week on all approved permits for the relevant season, unless otherwise approved by the Citywide Athletic Permit Coordinator."

² Proposed language in 2-12 b 6. vi. "due to space limitations, the Department may reject permit requests from applicants that seek the reservation of ballfields or courts for [practice sessions] Practice. Permits issued for [practice sessions] Practice will not be treated as part of a Returning Applicant's previous season's permits for purposes of determining whether an applicant is a New Applicant or a Returning Applicant."

multiple field permits sometimes exceed 32 hours per week, but the hours are proportional to the number of youth served and the multiple fields and increase hours are necessary to reach these various underserved populations. If multiple-field permits are capped at 32 hours per week, SBU would not have the space to operate programs that serve youth from all of these high-need demographics. And, as an organization that is uniquely equipped to support these groups (for example, we have two social workers and an immigration services manager on staff), we know that other groups are rarely serving these demographics.

In order to cap the permit hours equitably, the number of youth served—and particularly the number of high-need or at-risk youth served—should be taken into consideration. Otherwise, **due to the high number of youth and the specific populations SBU reaches, the capping and removal of our permits in favor of other leagues, new groups, or adult games would lead to a significant decrease in the number of vulnerable children accessing park-based programs.**

Second, the categorization of recreational programs as “practices” and the prioritization of games over practices would likely have a similar affect.

Programs that serve large numbers of youth and programs in low-income communities are both more likely to be deemed as Youth Recreation and therefore as “Practice”. This is often because formal games and leagues require increased financial, organizational, transportation, and family resources.

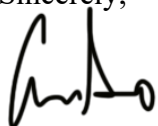
Furthermore, by their very rules, games limit the number of players on a field thus limiting the number of children who can access the activity at a time. For example, SBU’s recreational soccer program can serve up to 128 children, ages 5-10 on a full-size soccer field at one time, by dividing the field into 8 mini-fields with sport activities and mini-games (with or without referees). For many of these children, this is the only athletic activity they get over the weekend. Would this lose priority to formal games? In contrast, a formal game (youth or adult) would only reach 22 individuals at one time on the same field. **New York City should be protecting recreational activities and programs that reach more underserved youth rather than making it harder for these programs to secure and retain permits.**

Again, in both of these cases, **if the proposed changes were to take effect**, our permits might be removed in favor of other leagues, new groups, or adult games, and as a result **there would be a significant decrease in the number of children accessing park-based programs. Access would be decreased especially for underserved populations, in our case low-income youth, unaccompanied immigrant children, and girls.**

I hope that the Department takes these concerns and those concerns of many other programs into consideration in reviewing the proposed changes. If they are left to stand, many of our most vulnerable youth populations will in fact lose access to recreation and sports activities.

Please feel free to contact me at andrew@southbronxunited.org or at the above phone number.

Sincerely,



Andrew So
Executive Director
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