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January 24, 2016

RE: Comment on proposed Policy 45-16-1

Washington State Parks and Recreation Commission
1111 Israel Road S.W.
Tumwater, WA 98501-6512

Dear Commissioners:

On behalf of the Childhood Obesity Prevention Coalition, a state-wide coalition with 49 member organizations dedicated to protecting our children from the obesity epidemic, we are writing to provide comment on your draft advertising policy found [here](#), starting on p. 76

We are strong supporters of state parks and recreation interests in this state and appreciate the fiscal challenges presented to the Commission over the recent years. We are not troubled by the notion of a state agency needing to attract external sources of revenue, even thru commercial advertising.

Section F in your proposed policy is a substantial section that is well-thought out, but we believe omits a few specific products, namely: *unhealthy food and sugar-sweetened beverages*. The omission of these products is even more glaring when reading RCW 79A.05.087 that gave rise to this proposed agency policy, which explicitly notes how “(2) The commission is encouraged to use its advertising authority to promote ... (b) *Wellness, healthy food options, healthy behaviors*, and any other public health goals to principles adopted by the state” (emphasis added).

Along with multiple community groups and concerned parents, we worked with the Seattle School Board a few years ago when they were amending their advertising policy, and ultimately the [final policy](#) did honor our specific concerns. We would be happy to work with commission staff to help craft appropriate language.

Let's ensure that the citizens of our state receive clear and consistent messages about the importance of healthy food and beverages. State agencies need to make doubly sure that their messages, intended or otherwise, do not undermine the multiple publicly-funded efforts in this state to achieve better health for all, especially our next generation. Please modify Policy 45-16-1 to add unhealthy food and beverages to your list of prohibited advertising content.

Sincerely,

Victor Colman, JD
Director, Childhood Obesity Prevention Coalition
vicsolutions@comcast.net

COALITION MEMBERS

ACTION FOR HEALTHY KIDS – WA CHAPTER
 AMERICAN ACADEMY OF PEDIATRICS – WA CHAPTER
 AMERICAN CANCER SOCIETY – CANCER ACTION NETWORK
 AMERICAN CANCER SOCIETY, INC.
 AMERICAN DIABETES ASSOCIATION
 AMERICAN HEART ASSOCIATION
 AMERICAN PLANNING ASSOCIATION -- WA CHAPTER
 ARTHRITIS FOUNDATION
 BEECHER'S PURE FOOD KIDS FOUNDATION
 CASCADE BICYCLE CLUB EDUCATION FOUNDATION
 CHILDREN'S ALLIANCE
 COALITION FOR SAFETY AND HEALTH IN EARLY LEARNING
 FEET FIRST
 FORTERRA
 FOUNDATION FOR HEALTHY GENERATIONS
 GROUP HEALTH COOPERATIVE
 HOPE HEART INSTITUTE
 LET'S MOVE CHENEY
 MULTICARE HEALTH SYSTEMS
 NUTRITION FIRST
 ODESSA BROWN CHILDREN'S CLINIC
 PHYSICAL THERAPY ASSOCIATION OF WASHINGTON
 PUBLIC HEALTH ROUNDTABLE
 SCHOOL'S OUT WASHINGTON

SEA MAR COMMUNITY HEALTH CENTERS
 SEATTLE CHILDREN'S
 SEATTLE AND KING COUNTY PUBLIC HEALTH
 SEATTLE PARKS AND RECREATION
 SKAGIT COUNTY HEALTHY COMMUNITIES PROJECT
 SNOHOMISH HEALTH DISTRICT
 SPOKANE REGIONAL HEALTH DISTRICT
 TACOMA PIERCE COUNTY HEALTH DEPARTMENT
 TRANSPORTATION CHOICES
 WA ASSOC. OF COMMUNITY & MIGRANT HEALTH CNTRS
 WASHINGTON BIKES
 WA COALITION FOR PROMOTING PHYSICAL ACTIVITY
 WASHINGTON DENTAL SERVICE FOUNDATION
 WASHINGTON RECREATION & PARK ASSOCIATION
 WASHINGTON SCHOOL NUTRITION ASSOCIATION
 WA ST ASSOCIATION OF LOCAL PUBLIC HEALTH OFFICERS
 WA STATE ACADEMY OF NUTRITION AND DIETETICS
 WASHINGTON STATE DAIRY COUNCIL
 WASHINGTON STATE PTA
 WASHINGTON STATE PUBLIC HEALTH ASSOCIATION
 WASHINGTON SUSTAINABLE FOOD & FARMING NETWORK
 WASHINGTON TRAILS ASSOCIATION
 WITHINREACH
 YAKIMA COUNTY MEMORIAL HOSPITAL
 YMCA – GREATER SEATTLE