



Parks for All

presented by

PARC
(Parks and Recreation Coalition)

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- The Parks and Recreation Coalition (aka PARC) is made up of volunteers who signed a coalition letter and testified requesting improvements to the Parks component of Complete Communities at the November 9 City Council hearing, at which time the City Council declined to approve the program.
- PARC includes city planners, landscape architects, architects, and community planners.
- This presentation, Parks for All, acknowledges the work that has been done on the Parks Master Plan, General Plan Recreation Element, and Citywide Park Development Impact Fee (which make up the Parks component of Complete Communities) and describes the improvements that PARC is requesting be made before the proposals are brought back to City Council for adoption.



“Park improvement is among the most important undertakings before the city. It should have the cordial cooperation of all.”

San Diego Union Editorial 1910



Why are we here? WE NEED PARKS! Parks are VITAL to everyone and this has been especially illustrated during the pandemic. The city’s draft Parks Master Plan proposes significant changes to park standards and the way Development Impact Fees are calculated.



This one will have to last a long time!

PARC
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THE GOOD: Admirable Goals

- Promotes a parks system that is relevant, accessible, iconic, sustainable and equitable
- Meets the changing needs and priorities of current and future residents
- Addresses long-standing inequities in the City's park system

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This is the first Parks Master Plan in 50 years! We appreciate the efforts to make equitable investments into our park system. PARC supports addressing inequities in the parks planning and allocation processes, including the Citywide Park fee, though we have questions about how it is being calculated and how it will be allocated.

What needs to be improved and how?



We appreciate the amount of time and commitment that staff put into the Plan; we believe, however, staff was not afforded enough time to address significant issues that can be addressed now.

Issues with the Parks Master Plan

- Limited resident participation after release of Draft
- Limited vision: Less parkland for our growing city
- Equity, Funding & Prioritization Framework for Citywide Park Fee
- Untested: Points system and park standards
- Commercialization, MSCP, Historic Resources, Design Review, Implementation issues



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- While the city held many meetings for input into the Plan, after the Draft Plan was released, the prior administration invested most of their time in the Housing and Mobility components of Complete Communities, and, we feel, pushed the PMP forward on the artificial deadline of the election. Presentations were not made to Community Planning Groups or Community Recreation Groups.
- One of the biggest issues is the elimination the current land standard just when we're increasing housing density and incentivizing smaller units. We support the need for flexibility for communities to add recreational amenities into parks but there should still be an easily understandable land standard. **More people need more parks**, not just more amenities added into existing parks. As with affordable housing, just because we can't meet the goals doesn't mean we shouldn't have them. We have found no other city that doesn't have a clear land standard.
- Funding and Equity: We all know there's not enough, and we are suggesting additional potential funding sources. The Prioritization Framework refers to how the new Citywide Park Fee will be allocated to meet the equity goals. This should be released as soon as possible; it was supposed to be released in January.
- The points system is complicated and as the first such approach being tried by any City, needs more discussion and changes.
- Other issues we've identified and will be addressed in this presentation are listed in the fifth bullet.

Public Engagement



The first step in equitable park planning is to *“be in conversation with communities to get their vision for what they want parks to be, whether that’s building new parks or reimagining existing spaces.”* Room to Roam, Lincoln Institute of Land Policy, October 2020

REQUEST: Consult with Community Planning Groups & Community Recreation Groups



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- Due to the push by the outgoing administration, the Planning Department did not involve individual Community Planning Groups or Community Recreation Groups after the draft Plan was released. We believe presentations should be made to these groups not just to the Community Planners Committee (CPC).
- Since this Plan will be the basis for any bond measures on future ballots, it's critical is that public support is built now. We need to love this Plan as much as we love our parks!

Limited Vision: Less parkland for our growing city



Higher density housing, smaller-sized units and more people increases the need for more parkland. More housing without more parkland will not create a world-class parks and recreation system. Parkland is significantly devalued; policy is only “continue to pursue.”

REQUESTS:

- Retain the park acreage standard
- Include minimum protections for passive recreation in parks
- Increase minimum % funding for parkland acquisition



- The Parks Master Plan & Recreation Element devalue & reduce standards for more parkland. Higher density housing, smaller-sized units and more people increases the need for more parkland, not just adding “amenities” in existing parks. Having no benchmark for new parkland means there’s no standard to determine the need for parkland and park deficiencies are wiped out. We think the park acreage standard should be retained. As with affordable housing goals; they are difficult to meet but should not be eliminated.
- We understand that “limited vacant land and rising acquisition costs make it increasingly difficult to meet the acreage-based standard” but we should not give up trying. With a projected population increase of 350,000 people during the next 30 years, it would be harmful to adopt a policy which aims to primarily use existing parks to satisfy our residents' parks and recreation needs. More people need more parks. If we are not “built out” for housing; we are not “built out” for parks.
- Existing passive park lands are put at risk due to the incentives in the points system. Protections for open parkland for passive recreation need to be improved.
- The only way to really ensure more parkland is to set-aside a fund for it. A 10 percent minimum set-aside for land acquisition was added to the draft resolution in Nov. We think this percentage should be increased.

Funding for parks



The Development Impact Fee (DIF) system is not a sufficient source of funding to meet the city's park needs nor can it be used for operations and maintenance.

REQUESTS:

- Build support for other significant funding sources
- Retain policy in Recreation Element to do nexus study to establish fees for non-residential uses (RE-A-2 d)
- Require Community Benefit Zoning analyses in community plan updates and upzones for parkland acquisition
- Disclose and review assumptions and rationale for 60% discount for land costs in the DIF formula

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- The new Citywide Park Development Impact Fee is a key implementation tool for the Parks plan but is **not** a sufficient source of funding to meet the city's park needs. Other sources are critical but with estimates for DIFs exceeding \$1 Billion, significant changes to the DIF — from a community based system to a citywide system — merit greater transparency.
- First: The city needs to commit to other funding sources and build support for them beginning with this Plan.
- Second: The existing Recreation Element includes a recommendation for the City to determine the correct level of fees for non-residential uses. Currently, DIFs are only paid by residential projects. The city should retain the policies that call for analyzing the potential for non-residential park DIFs not delete them.
- Third: Community Benefit Zoning is a method for the city to share in the increased value associated with upzoning properties rather than giving property owners increased density for free. Downtown had a CBZ program that has raised millions for urban improvements. CBZ should be analyzed in Community Plan Updates as a way to fund public benefits.
- Fourth, The formula that establishes DIFs consists of: construction costs, contingency costs, admin overhead, and a land component that is called Right-of-Way costs. In the proposed Citywide fee land costs (based on a set of 24 parks recently completed or under construction) are discounted by 60% - is this a fair discount? More information should be provided to the public to support this discount.

Address Inequities



REQUESTS:

- Require minimum payment of DIF fees into Citywide fee fund
- Disclose assumptions for DIF estimates: will overall funding go up or down?
- Link Prioritization Framework for DIF allocation to Parks Master Plan
- Include sufficient time for public review

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- Redlining and other discriminatory policies have shaped the location of housing, freeways, businesses, and parks that affect health in today's urban landscape. Specific to parks, researchers have identified that increased heat islands have left some areas several degrees hotter than others.
- To achieve equity goals, we need to follow the money - both how it's raised and how it's spent.
- First, one of the policies in the existing system that has led to inequities and is proposed to be continued, is allowing developments (e.g. Civita in Mission Valley) to waive 100% of the DIFs by satisfying park standards on their own sites. This works great for those communities, but provides nothing for other parts of the City thus perpetuating inequity. We recommend that a minimum fee be required into the Citywide Park fund as a way to mitigate inequity.
- Second, staff has not responded to queries seeking to determine the assumptions that make up the more than \$1 billion in DIF fee estimates for the new system and the old. The timeframe and assumptions they make are critical to understand whether the new system will generate more or less additional funding overall and inform decisions related to setting those fees and whether or not they are equitable. Transparency is essential.
- Third, the staff report for the November hearing noted that Engineering & Capital Projects is already working on the Prioritization Framework with an update to Council Policy 800-14 Prioritizing Capital Improvement Program Projects. "It is anticipated that this update will include a new focus on Communities of Concern, park deficient communities and communities anticipated to experience the most residential growth." This policy should be released as soon as possible to understand how the allocation of these funds will help address historic inequities and park needs.

Complicated Points System

- Creates untested & confusing points-based system as new standard for park land and amenities
- Combined system pits land vs. amenities
- 10 sq. ft. interpretive sign has same point value as 1 acre park!

REQUESTS:

- Simplify by separating Land Standard from Recreational Amenity points
- Clarify how point system will be used
- Separate Community Planning usage from DIF calculation usage of points
- Establish review process and refine over time



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- The Plan needs to be straightforward for staff and the public to understand. Volunteers in Pacific Beach took the points charts to all their parks to determine whether they'd be more, or less park-deficient under the new plan - and also to get experience with it. It's confusing and complicated. Examples of where points don't make sense are many; here are two: 1) A sign and a 1-acre park each have the same point "value" and 2) a 3-acre park and an 8-acre park also have the same point value.
- The proposed combined system of land and amenities using the same points scale creates bad incentives. From a practical standpoint, it could lead to developers providing smaller parks filled with recreational amenities due to using less expensive items (the cheapest points) to meet their requirements. The Points system does not adequately protect our habitat lands or coastal-based parks or protect passive parkland from the "play everywhere" emphasis.
- After a lot of thinking about the system, our recommendations are to: Simplify by separating Land from Recreational Amenity points; Better define the application of the points system; Separate Community Planning usage from DIF calculation usage; and Establish a specific review process for the application of the points system for refinement over time.
- Regarding the separation of Community Planning usage from DIF usage: The major use of the points system is for developers to use it to calculate their DIF fees and make decisions about what to build on-site instead of paying DIFs. The other usage would be for Community Planning. But this usage is insufficiently documented and in trying to work with the system, we believe the CP usage should be separated from the DIF usage. There appears to be no reason why communities should use points to determine their recreational and park needs. If a community wants a skatepark or pocket park, it should be up to them to define through a public process and then to seek funding, not to be concerned about arbitrary points.

Commercialization of Public Parks



- Language deleted from Recreation Element: “Protect parks from commercialization and privatization.”
- Language added in Draft Recreation Element: “Policy A.3: Where appropriate, accommodate and design for temporary or permanent commercial uses in parks to increase public use of the park’s space. Examples of commercial uses may include, but are **not limited to**, restaurants and cafes, food trucks, carts and kiosks, youth-oriented facilities, bike rental and repair, museums, cultural centers, **other retail uses, and other similar uses.**”

REQUESTS:

- Retain language proposed for deletion: “Protect parks from commercialization and privatization.”
- Fix language: “Protect parks from commercialization and privatization. Ensure that commercial uses within parks contribute to the recreational use and value of the park and are sufficiently limited.”

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- These commercialization Changes were never presented or highlighted in reports or public presentations to the City Council. They are removing important protective language and replacing it to encourage commercialization without sufficient limits.
- The Draft language is repetitive and subjective and is poor English, but the **items in red (not limited to, other retails use and other similar uses**” each and together support beyond what is a reasonable list of uses - too much more. Here is our suggestion for how to FIX it and note that the language **Ensure that commercial uses within parks contribute to the recreational use and value of the park** is from the proposed Plan, and we are open to ways to set the limits.

Historic Resources



Historic resources, including cultural landscapes, are barely mentioned and not discussed

REQUESTS:

- List Historic Resources in parks
- Assess their condition
- Preserve using applicable standards
- Train existing staff



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Parks have many Historic Resources but they are barely mentioned, and not discussed in the Plan. These important resources should be documented in the Plan. And more staff training is needed to ensure their preservation.

Open Space & Biodiversity

- Open space policies are important in reducing climate change impacts.
- MSCP lands are legally protected habitat reserves and should be managed as such. To ensure consistency with City of San Diego MSCP obligations and to avoid future project by project conflict, MSCP Consistency Findings should be confirmed prior to identification of trails or other public use areas with potential MSCP impacts. Trails and other impacts must be addressed in a manner consistent with criteria set forth in the MSCP.

REQUESTS:

- Strengthen climate change policies (use more recent data; address carbon uptake, tree canopy issues)
- Ensure sound process based on MSCP criteria for establishing trails within MSCP areas



Many groups are concerned about encroachments into habitat reserves and we need to ensure they are adequately protected. A robust public review process is needed for the trails that can be allowed. Also, open space policies are important in addressing the impacts of climate change.

Park Quality / Design Review



“Get out and take a walk in a ‘good’ park. Look at the elements that cause it to work well. Talk to the people who use it and find out what features they value most. -Peter Katz

“What makes a good urban park”

Congress for New Urbanism, Public Square, 1 March 2017



Design Matters: One Size Does Not Fit All

REQUESTS:

- Re-build the Parks and Recreation Department Park Planning and Development Division
- Re-establish the citywide park Design Review Committee
- Add policies and criteria for the planning and design of parks with community input

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- Design and Design Review is not adequately addressed in the Plan. Standards alone will not provide the high quality parks and facilities that will meet the needs of individual community.
- To implement the Guiding principles the City needs to rebuild the Parks & Rec Planning and Development division to include landscape architects and urban design professionals who are working on behalf of the public interest.
- Re-establish the Design Review Committee and Add design policies to the Plan.
- “Get out and take a walk in a ‘good’ park. Look at the elements that cause it to work well. Talk to the people who use it and find out what features they value most. -Peter Katz. “What makes a good urban park” Congress for New Urbanism, Public Square, 1 March 2017

Implementation



Implementation of the PMP and Recreation Element requires internal and external oversight to ensure goals and policies are met

REQUESTS:

- Implement Citywide DIF via Municipal Ordinance and not just a Resolution
- Bring Prioritization Framework (CP 800-14 (Prioritizing Capital Improvement Program Projects) forward as soon as possible
- Update CP 600-33 (Public Notification and Input for City-Wide Park Development Projects) via public review process
- Require Annual Report on implementation of the PMP, Recreation Element, and Citywide Park DIF for public review beginning with Community Planning Groups

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- Resolutions do not have the legal force that Municipal Ordinances have and are much easier to change and harder to enforce.
- Council Policy 800-14 PRIORITIZING CAPITAL IMPROVEMENT PROGRAM PROJECTS was noted in the November 9 staff report as coming forward in early 2021, and should be publicly released ASAP.
- Council Policy 600-33 - The process for park projects needs to be revised to make it consistent with the Plan goals.
- Just as the City is requiring annual reports for the Housing and Mobility components, annual reports also should be required for the Parks component.

Timely Completion



- Improvements/requests can be accomplished in reasonable timeframe
- Changes being requested are specific



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There hasn't been a Parks Master Plan for 50 years and this is likely to be the Plan for the next 50. We can take the time to make improvements. The changes we are requesting are doable and it is vital that the Parks Plan is loved by all just as our parks are, so that voters will support more funding.

Parks for All



Park Proximity

- Increases property values as much as 20%
- Higher property values = higher taxes
- Attracts new businesses & visitors

Local Parks

- Maintain Physical & Mental Health



The pandemic has underscored the need for more urban parks for everyone for our physical, mental, and emotional health. And please note, that in the fight for needed funds, proximity to parks increases property values and high-quality parks draw new businesses and visitors. More people not only need more parks, the city and property owners gain from them financially as well.

MORE details (probably not time to include):

- Inner city homes within a quarter mile of a park have an increase value of 10% on average
- A home near just a cleaned-up vacant lot will have an increased value of 17% on average
- Residences next to a larger and longer “greenbelt” area which is great for hiking or biking saw a increase of 32% in home value on average

ref: The Park Catalog, Oct 2018

“High-quality public parks and open space draws new businesses and visitors to cities.” Room to Roam, Lincoln Institute of Land Policy, Oct 2020

Local parks and green spaces play a crucial role in maintaining physical and mental health and helping communities navigate toward recovery. (National survey conducted in May 2020 for the 10 Minute Walk coalition by The Trust for Public Land, Urban Land Institute, and National Recreation and Park Association)

“Proximity to parks increased property values as much as 20 percent, which in turn increases local tax revenues. High-quality public parks and open space also draw new businesses and visitors to cities.”

Quotes from “Room to Roam: The pandemic has underscored the need for more urban parks: So what comes next?” Land Lines October 2020, Lincoln Land Institute of Land Policy

What we would like you to do

Suggested MOTION:

- Support the improvements to the Parks Master Plan and Recreation Element recommended by PARC
- Send letter of support to the Mayor and City Council requesting that city staff work with Community Planning Groups, Community Recreation Groups, and PARC for input



Suggested motion for community planning groups and other organizations.

Thank you!



“A park is unlike any other asset in the city. It is not a building, not a production line, nor a warm breeze. A park is a living, growing thing that will die if the will of the people dies, or it will flourish as much as they want it to.”

San Diego Union, January 1969

***Email questions/comments and individual endorsements to:
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THANKS for your time and consideration and we're happy to answer questions or get back to you if we don't know the answers right now. The email address is on the slide for anything that may come up after this presentation.

Summary of Improvements Needed



- **Public Transparency: Involve Community Planning Groups and Community Recreation Groups**
- **Funding:**
 - Bring forward funding, prioritization framework, and other implementing mechanisms (Council Policies) concurrently with PMP/RE
 - What is correct DIF discount on the land component (in the Nexus study)?
 - Retain Recreation Element policy to do nexus study for non-residential park DIFs
 - Require Community Benefit Zoning analyses in future community plan updates and upzones
 - Require minimum payment into Citywide Park Fee for on-site developments (codify ad hoc Park Fee)
 - Increase % set-aside for park land acquisition
- **Standards:**
 - Retain acreage standard
 - Separate land metrics from amenity metrics
 - Separate DIF usage from Community Planning usage
- **Control commercialization: Retain protective language**
- **Other:** Equity, Historic Resources, MSCP, Design Review, Disclosure of data and assumptions, Reporting/Oversight

Discussion slide - summary of recommended improvements.