



# Parks for All

presented by

PARC  
(Parks and Recreation Coalition)

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Presentation to All 1-5-21

- Thank you for taking the time to consider these important issues. My name is <> and I'm <add relationship here>.
- PARC is work-in-progress made up of volunteers who signed a coalition letter and testified requesting improvements to the Plan and the process at the Nov City Council hearing. PARC includes professional city planners, landscape architects, architects, and community planners.
- We are committed to assisting the City in improving the proposed Parks Master Plan to provide a parks and recreation system to proudly serve the current and future citizens of San Diego for many years to come.



***“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 LOVE PARKS! WE NEED PARKS! Parks are VITAL to everyone and this has been especially illustrated during the pandemic.

## What's Right About the Parks Master Plan



- “To provide opportunities for everyone, all park planning efforts should promote a parks system that is relevant, accessible, iconic, sustainable and equitable.”
- “Parks and recreational programs should meet the changing needs and priorities of residents, both now and in the future.”
- “Park planning and investments should address long-standing inequities in the City’s park system.”

**The goals of the Park Master Plan are excellent, but the plan requires additional work in order that the goals can be successfully met.**

These are quotes from the Plan. 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.

## What needs to be improved and how?



We appreciate the amount of time and commitment that staff was able to put into the Plan. The artificial deadline did not provide enough time to address significant concerns that can be addressed now. Also, I'm going to be covered a dense amount of material, so please take notes along the way with any questions you have.

## Issues with the Parks Master Plan

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



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- One of the biggest issues is the elimination the land standard just when we're increasing housing density and incentivizing smaller units. We support the need for flexibility for communities to choose infill into parks but there should still be a land standard. **More people need more parks**, not just more stuff into existing parks.
- While the city held many meetings for input into the Plan, after the Draft Plan was released, the prior administration invested most of the time in the Housing and Transportation portions and we feel pushed it forward on an artificial deadline. Presentations were not made to Community Planning Groups or Rec Advisory Groups. Since this Plan will be the basis for any bond measures on future ballots, it's critical is that public support is built now.
- Funding - we all know there's not enough and we are suggesting ways to help. The Prioritization Framework refers to how the new Citywide Park Fee will be allocated. This should be released concurrent with the Plan.
- 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 will be addressed in this presentation.

# 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: Engage with Community Planning Groups and Recreation Advisory Groups who are closest to park and land use issues and recognized by the City to provide input**

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- Due to the time crunch from the outgoing administration, the Planning Department did not involve individual Community Planning Groups or Recreation Advisory Groups after draft Plan was released. We feel it's inadequate to only make presentations to the Community Planners Committee. CPC representatives can only take positions on items where their groups have taken a position. And in the Zoom era it's cheaper and easier to engage with groups.
- It also appears that more time was spent working with the development community than citizen groups. Since this is likely to be the Plan for the next 50 years and the basis for any park bond, the plan needs to be easy to understand to be able to gain the support for voters for future funding approvals.

## Limited Vision: Less parkland for our growing city



- *More housing without more parkland will not create a world-class parks and recreation system. **Higher density housing, smaller-sized units and more people increases the need for more parkland, not only adding “amenities” in existing parks.***
- Parkland is significantly devalued; policy is only “continue to pursue”
- REQUEST: Retain the park acreage standard
- REQUEST: Include minimum protections for parks for passive recreation
- REQUEST: Increase minimum % for park land acquisition

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- The problems with the existing system are not related to the standard of more land for parks - the **need** for additional park land remains the same yet 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 only adding “amenities” in existing parks.
- Having no benchmark for new park lands means there’s no standard to weigh it against as communities and the Mayor & Council make choices.
- We understand that “limited open land and rising acquisition costs make it increasingly difficult to meet the acreage-based standard” but should we give up? NO! The land standard is not the problem. 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 the residents' park and recreation needs. More people need more parks.
- Existing passive park lands are put at risk due to the incentives in the points system. Protections for open park land for passive recreation need to be improved.

## 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 Land Value Recapture analyses in Community Plan Updates for parkland acquisition
- Disclose and review assumptions and rationale for 60% discount for land costs in the DIF formula.

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- Plans sit on the shelf unless we know how to fund them and this Plan will be the basis for any future park bond measures so the details and engagement with the public matters for when they are asked to vote for new funding.
- The Development Impact Fee - known as a DIF system - both existing and proposed - 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 merit scrutiny and transparency.
- First, commit to other funding sources and build support for them
- Second: The existing Recreation Element contains policies for the City to determine to correct level of fees for non-residential uses. Current DIFs are only paid for residential uses. The city should retain these policies and not delete them.
- Third: Land Value Recapture is a method for the city to share in the value for upzoning properties rather than giving them away for free. Downtown currently had a LVR program that has raised millions for urban improvements. LVR should be applied in Community Plan Updates for usage in those communities.
- 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. Land costs, based on a set of 24 parks recently completed or under construction inform the land component. But this component is then discounted by 60% - is this a fair discount? We've been unable to see the justifications for this large discount. Is this the right discount?



## Equity



- “Ensure that park fees are expended consistent with City equity goals and where parks are needed most to ensure an interconnected Citywide parks system accessible to all.”
- Address inequities of waiving all Park DIF Fees for on-site park development. Require minimum payment into Citywide fee fund
- Disclose assumptions for DIF estimates comparing whether overall funding will go up or down
- Bring Prioritization Framework for DIF allocation forward with PMP including sufficient public review time

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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.
- AND To achieve equity goals, one has 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, has been to allow developments to waive 100% of the DIFs by satisfying park standard on their own sites. This works great for their own communities, but provides nothing for other parts of the City. We are recommending that a minimum fee be required into the Citywide Park fund. There is already an ad hoc fee being paid under the current system by some projects, but this is not codified in the proposed Plan.
- Second, staff has not responded to queries seeking to determine the assumptions that make up the more than \$1 billion in DIF fees 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. So transparency is essential.
- Third, the staff report dated Sept 15, 2000 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.” We need to see this policy as soon as possible and it should come forward concurrent with the Plan.

## Complicated Points System



- Creates untested, subjective, and confusing parkland-combined-with-amenities points-based system as the new standard
- 10 sq. ft. interpretive sign has same point value as 1 acre park!
- Application of the points system is insufficiently defined and the combined-points system pits land against “amenities”
- REQUEST: Simplify by separating Land points from Recreational Amenity points
- REQUEST: Better define application of points system - how will it be used?
- REQUEST: Separate Community Planning usage from DIF calculation usage of points
- REQUEST: Establish specific review process of the application of the points system for refinement over time

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- This is likely to be the Plan for the next 50 years and it needs to be straightforward for staff and the public to understand. Volunteers in Pacific Beach took the points charts to all their parks to seek 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 — just one: A sign and a 1-acre park each have a “value” of one point.
- This combined system of land with amenities on the same points scale creates bad incentives. It could easily lead to developers providing smaller parks filled with less important items by using items with the cheapest points for their requirements. The Points system also does not adequately protect our habitat lands or coastal-based parks or protect passive park lands from the “play everywhere” emphasis. We have developed a more detailed background paper about points and parks standards.
- After a lot of thinking about the system, our Recommendations are to: Simplify by separating Land points from Recreational Amenity points; Better define application of points system - how will it be used? Separate Community Planning usage from DIF calculation usage of points and Establish specific review process of the application of the points system for refinement over time.

- Regarding separating 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 think in terms of their recreational and park needs. If they want a skatepark or pocket park, it should be theirs 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.**”
- REQUEST: Retain language proposed for deletion: “Protect parks from commercialization and privatization”
- REQUEST: 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 Council. They are removing important protective language and 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 more 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
- **REQUEST: Inventory Historic Resources in parks; assess their condition; Preserve using Secretary of Interior Standards for Historic Properties**
- **REQUEST: More staffing needed**



Parks have many Historic Resources but they are not even discussed in the Plan and barely mentioned. What we have should be documented in the Plan.

## Multiple Species Conservation Plan



- MSCP lands are legally protected habitat reserves and should be managed as such. Trails and other impacts must be addressed in a manner consistent with criteria set forth in the MSCP.
- **REQUEST:** 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.



Many groups are concerned about encroachments into habitat reserves and we need to ensure they are adequately protected and provide a public review process for the trails that can be allowed.

## Park Quality / Design Review



- Standards alone will not ensure that we will have the excellent parks and facilities that will meet the needs of individual communities. One size does not fit all. Design matters.
- REQUEST: Re-build the Parks and Recreation Department Park Planning and Development Division. Ensure that landscape architects and urban design professionals are included on staff.
- REQUEST: Re-establish the citywide park Design Review Committee.
- REQUEST: Add policies and criteria for the planning and design of parks, their location in communities, and how they should integrate into and enrich the neighborhood fabric.

*"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. And while you're there, don't forget to smell the flowers."*

*-Peter Katz. "What makes a good urban park" Congress for New Urbanism, Public Square, 1 March 2017*

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- Design and Design Review is not addressed in the Plan.
- To implement the Guiding principles the City needs to rebuild the Park & Rec Planning and Development division to include landscape architects and urban design professionals who are **working on behalf of the public interest** and who can negotiate on an equal footing with developers over park proposals.
- Re-establish the Design Review Committee and Add design policies to the Plan.

## Implementation



- Implementation of the PMP and Recreation Element requires internal and external oversight to ensure goals and policies are met
- REQUEST: Implement Citywide DIF via Municipal Ordinance and not just a Resolution
- REQUEST: Bring Prioritization Framework (CP 800-14 (Prioritizing Capital Improvement Program Projects) forward as soon as possible
- REQUEST: Update CP 600-33 (Public Notification and Input for City-Wide Park Development Projects) via public review process
- REQUEST: 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 already coming forward in early 2021
- Council Policy 600-33 PUBLIC NOTIFICATION AND INPUT FOR CITY-WIDE PARK DEVELOPMENT PROJECTS needs revisions to become consistent with goals
- Just as they are requiring annual reports for the Housing and Mobility components, require for Parks

## Timely Completion



- We believe improvements/requests can be accomplished in reasonable timeframe
- Changes being requested are specific

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



- 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)
- “Increased exposure to green space has been linked to higher cognitive abilities, reductions in aggressive behaviors, and a stronger sense of community.”
- “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

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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



# What we would like you to do

Suggested MOTION: "We support the approach of the Parks and Recreation Coalition (PARC) in obtaining needed revisions to the draft Parks Master Plan and Recreation Element"



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: [planning@icontactweb.com](mailto:planning@icontactweb.com)***

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Our request is for the City to work with us to address these issues and for groups to ask the City to do so, and endorse this presentation, Parks for All.

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 come up after this presentation.

# Summary of Improvements Needed



- **Public Transparency:** Involve Recreation Advisory Groups and Community Planning 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
  - Apply Land Value Recapture in future upzones
  - Require minimum payment into Citywide Park Fee for on-site developments
  - Increase % setaside 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