

November 4, 2020

City of San Diego
202 C Street
San Diego, CA 92101

Dear Mayor Faulconer, City Councilmembers, and Planning Director Hansen:

Re: Complete Communities: Parks Master Plan and Recreation Element

We are community activists, planners and landscape architects who have analyzed and discussed the Complete Communities proposal. This comment letter concerns the Parks component.

Complete Communities consists of three components: Mobility, Housing and Parks. The adequacy of the three components is quite different:

1. The Mobility component meets a state mandate to shift to a Vehicle Miles Traveled analysis, and is based on appropriate methodologies and studies.
2. The Housing component has been changed significantly in positive ways due to public input to provide for more affordable housing and protections against displacement and gentrification.
3. Although its goals are laudable and the Parks Master Plan and Recreation Element contain valuable information, we believe the Parks component has major shortcomings and fatal flaws, a situation not remedied by the recent revisions.

We feel – strongly – that the Parks Master Plan and Recreation Element amendments should not be adopted. Instead, a new approach is needed.

While other people and organizations have made a great variety of comments and recommendations for revisions to the plan, our concern is fundamental. In a context in which Housing Solutions opens the door to significant increases in density, and the city has added 74,000 units of housing capacity since 2014 through community plan updates in neighborhoods already lacking in parkland, it would be fundamentally wrong to adopt an approach that values adding amenities to existing parks over obtaining more park acreage.

The City of San Diego is projected to add 357,000 residents by 2050. We believe the park and recreation needs of these future residents cannot be met primarily by using existing parks, which is the thrust of the proposed program.

Denser urban living must be balanced with appropriate amounts of parkland. Additional parks will be needed for active and passive recreation. We understand that in urbanized areas, it will be difficult to assemble land for parks. But if developers can find opportunities, why not the city? Difficult does not mean impossible.

We need to create America's finest parks and recreation system, not accept a system of overburdened parks. Tweaking the current proposal won't work. The city needs to take a new approach.

The key issue we've identified with the Parks Master Plan is the point system. The draft points system includes both acreage and amenities, with a target of 14 points per 1,000 population. This is a "closed system" which pits parkland against recreational amenities. All parks need land and appropriate amenities. The public should not be asked to accept "either-or." This approach will not provide an adequate system.

The proposed scoring system is faulty. It does not assign value equally for each acre of land. Acreage values cannot be compared to recreational amenities using the same metrics. The values assigned to amenities are arbitrary and subjective.

The following examples illustrate fundamental problems with the points system:

- a 3.1-acre park is equal to an 8-acre park (both 6 points)
- a 1,500 sq. ft. play area is equal to a 3-acre park (both 2 points), even though the 3-acre park (130,680 sq. ft.) is 87 times larger
- a 10 sq. ft. interpretive/educational sign or display is equal to a Pocket Park of up to 1-acre (1 point).

In addition to discounting the importance of land needed to support our growing population, the City proposes changes to commercialize parks without adequate controls by removing the following language: "Protect parks from commercialization and privatization" and adding language opening parks to a long list of commercial and "other retail uses." This would be a step backwards.

We support the goal of improved equity. If the aim is to make the park-deficient communities equal to the park-sufficient communities, this cannot be achieved in a system which greatly discounts the value of parkland. A small, poorly equipped park with some amenities added, is still a small park, not adequate to serve existing and future residents. We are concerned that the proposed plan will perpetuate inequities rather than rectify them.

The Parks Master Plan and Recreation Element amendments should not be adopted. To do so would be to condemn residents, both existing and new, to increasingly crowded and inadequate parks.

When the next Mayor and City Councilmembers are seated, the Planning Department and Park and Recreation Department should develop an alternative approach that would encourage the acquisition of parkland to keep pace with increasing population and density, and provide a variety of additional amenities that meet the needs of the diverse, growing population.

Finally, the City Council should recommend that in preparing the revised plan, the city staff engage in a robust participatory process, including the established community planning groups and recreation advisory groups. This effort should be focused in the urbanized communities of the city—where growth is being directed—communities that already suffer from a lack of parkland and recreational facilities.

Sincerely,
(names and affiliation of signers)