



CITY OF SAN DIEGO DRAFT PARKS MASTER PLAN JUNE 2021 - PARC COMMENTS

The Parks and Recreation Coalition (PARC) is an ad hoc group dedicated to excellence in park planning in the City of San Diego (City). Formed in November 2020, PARC supported the City Council's recommendation to send the initial draft of the Parks Master Plan (PMP) back for improvements.

PARC members include city planners, landscape architects, architects, and community planners. Six members worked for the City of San Diego, three of whom are retired park planners who worked for the City for more than 25 years each.

PARC members have presented proposed improvements to the November 2020 draft of the PMP to 35 community planning groups (CPGs), several community recreation groups (CRGs), and a number of other civic and community organizations. The vast majority of these groups supported PARC's recommendations, and sent letters so stating to Mayor Gloria and the City Council.

PARC strongly supports the Plan's goals. We have, however, identified significant issues, errors, and inconsistencies that we believe will undermine the success of the plan.

Funding

PARC supports the proposed Citywide Park Development Impact Fee, but it will not provide the necessary funding to create the equitable park system envisioned.

Significant additional funding will be required to ensure a park system that addresses all park deficits. The PMP is the instrument to inform and prioritize future funding, but the current draft is missing critical elements: a project list, identification of needs, and an asset assessment.

Park Standards/Recreational Value Points System

The Recreational Value Points System has been promoted as a "new and innovative" way to address the park deficiencies that the current standard of 2.8 useable acres per 1,000 residents has not. As stated in PARC's discussion paper, *Park Standards and the Points System: Analysis and Recommendations*, we believe the City is confusing problems related to the current system with the current park standard. **The current standard did not cause the inequities and deficiencies, and without it we lose a clear, objective way to measure park progress and deficiencies.**

While PARC supports the goal of increasing recreational value by providing new park amenities, no other city in the country uses a points system metric. Many cities have a higher acreage standard than San Diego.

The points system leans too heavily on amenities and devalues park land; both are important. **If the points system is approved, a percentage of points must be allocated for developed park land to ensure that park acquisition and recreation amenities are not competing against each other.** A minimum 20% of the proposed 100 points per 1,000 residents is recommended using the current proposed value of 7 points per acre. Any proposed modification to the points methodology and points per acre must require Council approval.

Process

The PMP relies heavily on development impact fee (DIF) funding, but significant new funding is needed to address historical inequities, and operations and maintenance costs. Community support is required to address this key issue, but public engagement has been inadequate. Now is the time to engage with people to build support for the PMP and adequate funding. Without this engagement, it is unlikely residents will support future funding increases for our park system.

Commercialization

The current draft does not appropriately limit commercial uses, which should not be a “typical” or permanent amenity within Community Parks as proposed. Parks in large urban areas provide a respite from commercial activities and an opportunity to retreat from urban conditions. Any proposed commercial activities/facilities should be vetted through a sound public input process.

Urban Forestry

Trees play an important part in sequestering carbon and reducing urban heat island effects. For this reason, stronger requirements for, and protections of trees, must be included in the PMP to ensure implementation of the City’s Climate Action Plan (CAP).

Recreation Value Points System Accounting Errors

PARC has identified a number of errors in the Recreation Value score sheets that may have significant impacts on the calculation of two foundational elements of the PMP: the proposed park standard and the Citywide Park fee.

Implementation/Design Review

The city should commit to public Design Review and a timeline for Future Implementation Actions.

Thank you for taking the time to consider PARC’s issues regarding the latest Draft Parks Master Plan. Without adequately addressing these issues, the future success of the City’s parks and recreation system is at stake.

Attached you will find a Summary of Recommendations, followed by the related detailed changes and context.

Respectfully submitted by the Parks and Recreation Coalition (PARC)

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SUMMARY OF RECOMMENDATIONS

Process

The #1 park sufficiency problem overall is the need for funding. Community support is required to address this key issue. The City should take the time now to engage with people and address their legitimate concerns to build support for our park system and its need for adequate funding. Without such public engagement it is unlikely our residents will support future funding for our park system.

Draft Resolution

- Ensure use of Citywide Park Fee is adequately limited to funding parks and does not replace existing Park & Recreation funding.
- Ensure the Citywide Park Fee is determined based on the park standard methodology. Park deficiencies should be determined using a park standard and not by an elected official. Include a definition and list of park deficient communities in the PMP.
- Do not limit funding allocation priorities to park deficient communities and Communities of Concern to five years. Inequities have built up for decades and may take decades to remedy.
- Include language that identifies the types of units exempt from the Citywide Park Fee.
- Require 10% of Citywide Park Fee to be “used” for acquisition of new park land not “prioritized.”
- Require 20% of the 100 Recreational Value Points/1,000 residents be allocated to park land acquisition.

Parks Master Plan

Park Land Standard

- Ensure the City Council and public have an easily understandable park land standard that is separate from a standard for Recreational Value.
- Retain the standard for provision of population-based parks at a minimum of 2.8 useable acres per 1,000 residents as a goal and provide a clear objective way to measure progress. If the current standard is eliminated, and the proposed Recreational Value Scoring Methodology is adopted, then a minimum of 20% of the 100 points (20 points) must be allocated for park land (using the proposed value of 7 points per acre).
- Add seating as a required element in all park typologies and add policies that require seating in all parks.

Recreation Value (RV) Points System

- Ensure the Recreation Value points score sheets are reviewed for errors. *Errors in any of the score sheets may translate into changes in the calculation of the Citywide RV standard and level of fees.*
- Clarify with an explanation in the PMP how the RV-points system will be used. *Will the RV-points system be used to plan public parks in community plan recreation elements, and as requirements for development projects? Will the points system be used to design all parks?*
- Require City Council approval for any proposed future modifications to the points methodology, including total points per 1,000 residents and the number of points per acre.

Reporting

- Require reports on the results and use of the RV-points system at least annually. *The Plan provides insufficient reporting requirements to measure park land acquisition and development progress.*

Funding

- Provide additional park funding through Community Benefit Zoning analysis in Community Plan Updates and major upzones with a significant portion of any benefit going to parks.

Commercialization

- Require adequate regulation and control of commercialization, advertising and signage including sponsorships within dedicated or designated park land.

Urban Forestry

- To be consistent with the City's Climate Action Plan (CAP), increase protections for trees and report annually on plantings and removals.
- Ensure protection of healthy, mature and specimen trees.

DIF calculation

- Provide a sufficient analysis for the 60% land discount in the DIF fee calculation.

Implementation/Design Review

- Establish and add priorities and timeline goals for PMP Implementation.
- Restore reference to the 2019 Park Condition Index and Park Assets Assessment in the PMP and use the data to inform the plan.
- Ensure the creation of a multidisciplinary Design Review Board for parks that includes community members.

Document Consistency

If the revisions to the General Plan and proposed PMP are approved, not one planning document will be consistent with the General Plan, or the Parks Master Plan.

General Plan Recreation Element

Park Standard

- Retain the standard for provision of population-based parks at a minimum of 2.8 useable acres per 1,000 residents as a goal and metric. If the current standard is eliminated, and the proposed Recreational Value Scoring Methodology is adopted, then a minimum of 20% of the 100 points (20 points) must be allocated for park land.
- Retain all references to population-based park standards.
- Retain park equivalencies text, if it is not incorporated into the Parks Master Plan.

DIF Fees for Non-residential uses

- Retain policy to study DIF fees for non-residential uses.

Commercialization

- Retain language that protects against privatization and commercialization.



This is not a complete list of PARC's recommendations. For a complete list, including background please see Attachments 1, 2, and 3:

- ***Background and Specifics for PARC Recommendations (Attachment 1)***
- ***Park Standards and the Points System: Analysis & Recommendations (Attachment 2)***
- ***Appendix A: Examples of PMP Recreational Values of Concern (from Parks Standards and the Points System: Analysis & Recommendations (Attachment 3)***

BACKGROUND AND SPECIFICS FOR PARC RECOMMENDATIONS

A. PROCESS

Timing & Community Engagement

The Parks Master Plan touts “community engagement.” Yet both drafts were only presented to the Community Planners Committee (CPC), not to Community Planning Groups (CPGs) or Community Recreation Groups (CRGs). PARC presented our recommendations for improvements to all but three of the CPGs, with thirty-one (31) of the CPGs and the Community Planners Committee (CPC) supporting PARC’s recommendation for more community engagement and many supported PARC’s recommended improvements and sent letters stating their support to the Mayor and City Council.

Recommendation: Additional community engagement to garner community support for the PMP is needed to ensure the adequate funding of our park system and a park system that meets community needs.

B. RECOMMENDED CHANGES TO THE DRAFT RESOLUTION

Changes proposed to the Draft Resolution:

1. WHEREAS No. 5:

“WHEREAS, the Citywide Park DIF will be used solely to fund parks and recreation facilities throughout the City, and”

Recommendation: Ensure use of Citywide Park Fee is adequately limited and does not replace existing Park & Recreation funding.

Proposed replacement language for WHEREAS No. 5:

WHEREAS, the Citywide Park DIF shall be used for capital projects only in dedicated or designated community-based parks (including portions of regional parks identified as serving community planning areas), and shall not be used to replace the existing Parks and Recreation budget (the City budget should maintain a minimum level of pre-Citywide Park DIF funding based on budgets from the past 10 years). and....

2. BE IT RESOLVED, by the Council of the City of San Diego as follows:

“16. That the Chief Financial Officer is authorized to distribute funds from the Citywide Park DIF in accordance with this Resolution, San Diego Municipal Code Chapter 14, Article 3, Division 10, and priorities identified in the Parks Master Plan. Specifically, for five years from the final passage of this Resolution, at least 80 percent of all Citywide Park DIF collected shall be prioritized for investments in park deficient communities, as determined by the Mayor, or his designee, with at least 50 percent of the 80 percent (40 percent of the total), being prioritized for investments in Communities of Concern, as determined by the Mayor or his designee.”

Recommendations:

- 1. Ensure the use of Citywide Park Fee is determined based on a clear definition and list of park deficient communities.**
- 2. Do not limit allocation priority to five (5) years; inequities have built up for decades, and will need more time than five years to resolve.**

Proposed revised language in strikeout/underline:

16. That the Chief Financial Officer is authorized to distribute funds from the Citywide Park DIF in accordance with this Resolution, San Diego Municipal Code Chapter 14, Article 3, Division 10, and priorities identified in the Parks Master Plan. Specifically, for five years from the final passage of this Resolution, at least 80 percent of all Citywide Park DIF collected shall be allocated ~~prioritized~~ for investments in park deficient communities, as determined by the Mayor or his designee based on the definition of park deficiency and list of park deficient communities found in the Parks Master Plan, with at least 50 percent of the 80 percent (40 percent of the total), being ~~prioritized~~ used for investments in Communities of Concern., ~~as determined by the Mayor or his designee.~~”

4. BE IT RESOLVED by the Council of the City of San Diego as follows:

“18. That at least 10 percent of the Citywide Park DIF shall be prioritized for acquisition of new park land.”

Recommendation: Change “prioritized” to “used.”

18: “That at least 10 percent of the Citywide Park DIF shall be ~~prioritized~~used for acquisition of new park land.”

5. ADD NEW BE IT RESOLVED No. 19:

Recommendation: To ensure additional park land will be acquired and to reduce the reliance on

19. Twenty (20) percent of the 100 points/1,000 residents shall be allocated to park land acquisition.

6. ADD NEW BE IT RESOLVED No. 20:

Recommendation: The Resolution should include a list (or make reference to a list in the PMP) of all types of dwelling units that are exempt from paying the Citywide Park DIF, e.g. Accessory Dwelling Units, opt-in Housing Solutions dwelling units of 500 sq. ft., etc.

20. Types of units exempt from the Citywide Park DIF include Accessory Dwelling Units (ADUs) etc. as listed in the PMP.

C. RECOMMENDED CHANGES TO THE PARKS MASTER PLAN

1. Park Land Standard:

The public and elected officials deserve to have an easily understandable park land standard separate from a standard for Recreational Value.

PARC created a discussion paper (Attachment 2) proposing a way to separate the points parks standard into two components: a land component and a recreational value/amenity component. One of the key issues in the PMP is the lack of clarity regarding the question: How much park land is being planned for the additional 325,000 people forecast to be added over the life of the plan? And what are the existing deficiencies for park land? Both the existing need and future need for developed park land should be included in the plan.

Recommendation:

If the proposed Points system is retained, require that a minimum of 20 percent of the 100 points/1,000 residents (i.e. 20 points/1,000 residents) be allocated to park land. Appendix E “The Park Scoring For Sample Community Plan Areas” identifies communities that currently meet, or are close to meeting the current City standard have park acres that make up between 15% and 29% of the total points.

This will help ensure that adequate park land is provided to address future growth and to ensure that park acquisition and recreation amenities are not competing against each other.

We applaud the addition of the goal for 100 acres in ten years, however this would be a land standard of approximately 1 acre/1,000 residents. The goal should be increased to better reflect the city’s current park deficit.

Recommendation:

- Added acres should be restricted to additions to neighborhood or community parks and not to regional or open space parks,
- should be located in Communities of Concern, and
- should count only developed acres, not just vacant acres.

2. Recreation Value (RV-Value) Points System is Confusing and Error-prone

The proposed point system is untested, unsupported by urban park planning experiences in other cities or park planning research. PARC does not think a system where the City and developers can value one acre of park land (seven points) the same as a 10-square-foot sign will produce better results for parks.

Both drafts of the Plan have contained significant errors in the park score sheets, which are being used to set the Citywide standard and to calculate the new Citywide Park Fees.

While some errors from the previous draft have been corrected, significant errors remain. The sheer number of categories to be judged and filled out inherently increases the number of errors that will be made along the way.

We have not estimated whether these errors would change fees up or down, but the scoring of the parks used in the Nexus study should be accurate. The increase in DIFs from the last draft (of about \$1,000 per unit overall) appears to be the result of correcting one significant error on a scoring sheet. Other errors remain, and two examples are described below.

Example 1

Each park in the four “model communities” (Carmel Valley, Linda Vista, Navajo, Mission Beach) chosen as the basis for creating the new 100 points/1,000 residents has a RV-points score sheet.

The score sheets contain significant errors and the numbers differ from what was included in the summary chart (page 25, Appendix E). *Each of these errors translates into mistakes in the establishment of the citywide standard of 100 points/1,000 residents.*

- Neither the Carmel Valley nor the Mission Beach totals match the Summary scores.
- "Regional Recreational Value" scores for Carmel Valley and Linda Vista are missing. These scores state the points for adjacency to: Regional Parks, Trails and Shorelines. If the scores are zero in any category, the scores should still be listed. Both these areas have trails and Linda Vista is considered adjacent to Mission Bay Park, so totals should not be zero. Regional Recreation Value scores are included for Navajo and Mission Beach (however Mission Beach Regional Recreation Value scores are shown under Lake Murray Community Park within the Navajo Community).
- The Linda Vista Skate Park is missing from the Linda Vista score sheets.

Example 2

Of the 26 Sample Parks used to establish the Citywide Park Fee, 13 are one acre or less and include one trail at zero acres. The Trail for All People has a listed land-related cost of more than \$1 million (Table 3 Nexus Study Appendix A), but the acreage is listed at zero in Table 2: Sample Recreation Value Score. On the Trail for All People RV-points scoresheet (which also has financial information), the acreage cost is listed as 1.46 acres with a cost of only \$407,616. Which is correct? *Changes in costs for the Sample Parks directly translate into changes in the Citywide Park DIF fees.*

Recommendation:

Correct the errors in the scoring sheets, PMP, and Nexus study and explain changes in costs for Sample Parks.

Recommendation:

Replace subjective point values with a cost basis.

3. Clarify how the RV-points system will be used

Points totals do not reveal how much park land is being planned nor even provide any low to high estimates. Will the RV-points system be used to plan public parks by the City and developers?

Recommendation:

Limit use of the RV-points system to the calculation of the Citywide Park Fee.

4. Reporting for measurement of park land progress

Policy A5, Page 94 of the PMP. Regular reporting is too vague.

Recommendation:

Revise to read: "Policy A5: Monitor the acquisition of new parkland as well as overall investments to the City's parks and recreation system toward achieving the Recreational Value Standard as well as the park acquisition goal (See Section 4.2) to expand access to meaningful recreational opportunities. Report on the status of the goal to the City Council regularly annually."

5. Additional Funding

Community Benefit Zoning (also known as Land Value Capture or Public Benefit Zoning) is a method that has already been used in downtown San Diego to generate millions of dollars in public benefit fees for parks. The use of this tool should be analyzed in all future community plan updates to help fund city park needs and other public benefits.

Recommendation:

Require Community Benefit Zoning analysis in Community Plan Updates and major upzones.

6. Commercialization

Adequately regulate and control commercialization, advertising and signage (including sponsorships) in the Recreation Element and the Parks Master Plan

Passive and unprogrammed uses are at risk in the name of "Activation" and "Recreational Value" as described in the Draft Plan. Appendix C Park and Recreation Facility Typologies (page 16) identifies commercial facilities as "typical" in a community park. Parks in large urban areas such as San Diego provide a respite from commercial activities and an opportunity to retreat from urban conditions.

It should not be "typical" that Community Parks have commercial installations. Commercial uses should only be allowed via a sound public process.

Policy AV3, Page 98 of the PMP provides language that is too broad and doesn't provide for any City review.

Recommendation:

Revise to read:

AV3: Where appropriate, accommodate and design for temporary or permanent commercial uses in parks to increase public use of the park's space. Examples of appropriate commercial uses in parks may include, ~~but are not limited to,~~ restaurants and cafés, food trucks, carts and kiosks, youth-oriented active recreation facilities, bike rental and repair shops, museums, cultural centers, and other park related and compatible uses, ~~so long as any of these uses are related to the enjoyment and use of~~

the park, so long as the size and signage for such uses is limited and reviewed by the Park & Recreation Board as compatible.

Policy AV, Page 98 of the PMP allows for 500 feet of commercial development with no approval necessary. Five hundred square feet is a 25' by 20' space. Any commercial use of any size should be reviewed and limited.

Limit use of funds from park commercial revenues to maintenance. The maintenance backlog is sufficient to use all of the funds generated. Do not split them up among more categories, and especially not "other investments."

Recommendation:

Revise to read:

AV4: "Unless otherwise reviewed by the Parks and Recreation Board and approved by the Parks and Recreation Department Director, commercial uses on City property in parks shall be limited to uses operated by the City, another government agency, or a non-profit or community-based organization, and the revenue generated from the commercial use shall be used to provide maintenance, programming, or other investments in City parks. ~~Fixed commercial uses less than 500 square feet shall not be subject to this approval.~~"

Policy CO5, Page 100 of the PMP discusses commercial activity that increases a "park's experience". Just about any activity could claim to increase a park's experience or encourage more people to use a park.

Recommendation:

Revise to read:

CO5: ~~"Where commercial activity would increase a park's experience or encourage more people to use a park, design space to allow for temporary or permanent park-serving commercial uses."~~ "Any space designed for commercial use shall be reviewed on a case-by-case basis. See Policy AV3 (included above).

Page 122, Policy F5 of the PMP

PARC supports Policy F5 that increases funding for parks, however commercial uses of parks must be adequately defined especially advertising and branding. Specific limits need to be established.

Recommendation:

Add a policy after F5 that reads:

Establish limits for commercial advertising, branding and sponsorship in public parks and require any commercial usage for a public park to be reviewed by the Park & Recreation Board and City Council depending on the type of agreement.

Page 122, Policy F14 of the PMP states: "Encourage private and semi-private recreation facilities developed on City-owned land to offer public-use no less than two full days a week at a cost recovery fee rate."

Do not encourage privatization in public parks especially not for only “two full days a week” as a minimum. It is inequitable to giveaway public land for private use and then require a fee for using it. At a minimum, *any facilities on public land should require public use during all open hours.*

Recommendation:

Delete this policy.

7. Urban Forestry

Policies and reporting measures related to trees and tree shading need to be strengthened to increase protections for trees to be consistent with the Climate Action Plan. The Plan states the importance of trees: (pg. 99) "Green spaces, trees, and restored habitat areas control runoff, provide stormwater treatment, contribute to clean air and water, and reduce heat in urban areas by expanding the urban tree canopy," the policies, however, are inadequate.

Recommendation:

Add language in the PMP that is consistent with the Climate Action Plan goals to maintain and increase the urban forestry canopy to reduce heat island effects — especially in Communities of Concern — and maintain and increase carbon uptake.

Appendix D “Recreation Value Park Scoring Matrix” states that Pocket Parks and plazas must have ...one (1) **36 inch box tree** installed for each 1,250 sq. ft. **or may have fixed architectural shade elements** for up to 50% of the shading requirement. In many cases 24” box trees establish quicker and have a greater percentage of survival.

Recommendation:

The maximum box size for tree plantings should be 24 inches.

Human connections to nature depend on including nature in parks. Architectural shade is not a substitute for trees. While developers prefer trees to be bigger for sales reasons, quoting from the comment letter by Anne Fege, Forester (Chair Urban Forestry Committee) *"Planting 36 inch box trees is an investment in poor tree health, as they don't adapt as well to the site as smaller trees and are often root bound when sold by nurseries. The maximum size should be 24 inches."* Otherwise, you will not have a healthy shade canopy over time.

Recommendation:

“Architectural shade elements” should not be a substitute for trees. If shade structures are used, they should not be in place of trees.

The importance of trees is recognized on page 95 of the PMP: “People are much likelier to visit a park if the path to the park is shaded by large trees” and page 109: “Trees and shady parks reduce heat, serving as natural cooling centers for residents.”

The City’s Heritage Tree program has been suspended even though existing policies and CSR5 in the PMP states: “Identify and protect heritage trees within the City’s park system to maintain the aesthetic, historical, and ecological value of the landscape.” Heritage trees have to be a minimum of 50 years old and fewer than 250 trees citywide have been established under the program.

Also, no protections for younger mature healthy trees exist. Planting replacement trees can never match the carbon uptake of existing mature trees.

Recommendation:

Add policy: “Protect mature healthy trees.”

Adding the above policy would not interfere with the City’s ability to remove dead, diseased or dangerous trees and is essential to reduce the removal of existing mature trees and support the CAP goal to increase the urban forest.

Policy C06 does create a policy to plant "drought tolerant resilient trees and native trees in parks," and CSR3 states: “Expand and maintain a healthy tree canopy and include other shade features in all parks,” but provides no standards for measuring success or reporting requirements.

Recommendation:

Add policy: Report annually on the number of public trees planted or removed, and the success/failure of past plantings.

8. Removal of Park Condition Index and Park Assets Assessment

In the June Draft PMP, the references to the Park Condition Index and the Parks Asset Assessments of all community parks completed in 2019 have been removed. Such an assessment is typically included in park master plans, and is required to support a successful effort to increase park funding.

The asset report reviewed the following list of assets in all of the City’s community and neighborhood parks and also Balboa Park: playgrounds, park furnishing, fences and walls, landscaping, playing fields, outdoor courts, parking lots, park roads and above-ground storm water devices.

It is not clear why this information is not included in the PMP, and while the new draft includes a long list of “Future Implementation Actions,” (Section 4.8) the Park Assets Assessment is not included on the list.

Recommendation:

The information from this report should be included in the PMP or its completion should be included in the list of Future Implementation Actions.

9. Nexus Study Appendix A, (see page 3)

A 60% land discount is included in the DIF fee calculation.

Recommendation:

Additional information and analysis should be included to justify this discount.

10. Timeline and priorities for Future Implementation Actions (see page 87 of the PMP)

The latest draft PMP added a list of future implementation actions.

Below is a partial list (6 of the 14) of future implementation actions added to the new draft. Many of these are required to support a ballot measure and are necessary to ensure a world-class park system.

- Park Needs Index -The systematic evaluation of park-related metrics to identify areas of the City which have the greatest need for parks in terms of quantity, quality, safety, and enjoyability.
- Citywide recreational value assessment - Evaluating all parks within the City using the new Recreational Value Scoring Methodology.
- Park funding prioritization policy and forecast - A strategy to guide the specific prioritization of park funds based on the evaluation of park-related metrics, to ensure that park investments in the areas with the greatest needs are prioritized. 5-year park funding forecast to ensure taxpayer funds are being allocated in line with Citywide goals.
- Alternative Park Funding Mechanism Analysis for Capital Park Projects - A review of all possible funding strategies including grants, bonds, and tax measures for Capital Park Projects.
- Alternative Park Funding Mechanism Analysis for Park Maintenance and Operation - A review of all possible funding strategies including grants, bonds, and tax measures for park maintenance and operations.
- Park Condition Index - Continue to evaluate the condition of all parks and determine the maintenance backlog.

However, these actions do not establish priorities or timeline goals.

Recommendation:

Establish priorities and timeline goals for Future Implementation Actions.

11. Design Review changes

“PP13: Consider forming a Park Design Review Board based on current practices for Boards and Commissions to review proposed landscape architectural designs for parks. A Design Review Board should be comprised of Landscape Architects, Park and Recreation professionals, and citizens that are representative and reflective of the demographics of the City’s population.”

Recommendation:

Replace "Consider" with “Establish,” and add wording indicating the Design Review Board should be comprised of “multidisciplinary members including Landscape Architects, Planners, Park and Recreation professionals, and citizens....”

Recommendation:

Add an update of Council Policy 600-33 (Public Notification and Input for Citywide Park Development Projects) and Council Policy 800-14 Prioritizing Capital Improvement Program Projects to the Future Implementation Actions.

D. RECOMMENDED CHANGES TO GENERAL PLAN RECREATION ELEMENT

1. Park land standard and equivalencies.

Current language in the Recreation Element establishes a land standard per 1,000 residents as a goal and metric, and provides equivalency language that allows the necessary flexibility to address the City's diverse community park needs. It is PARC's contention that the current land standard and park equivalency language is superior to the proposed points system and should be retained.

Recommendation: Planning staff have stated that the points system is legally required to establish the Citywide Park Fee. But since no other city has such a points system and other cities have equity programs and citywide or district-wide fees, the City Attorney should be asked to opine on whether the "points system" is legally required to attain the Citywide Parks Fee goal of replacing Community Plan-based DIFs.

2. DIF's for non-residential uses

Recommendation: Retain policy in current Recreation Element to do a Nexus Study to determine appropriate DIF fees for non-residential uses in all areas to provide potential additional funding for parks.

3. Commercialization

The amendments to the Recreation Element propose deleting RE-C.6. "Protect parks from commercialization and privatization if at the expense of public recreational use and benefit." And replacing it with "Ensure temporary and permanent commercial uses within parks are park-serving, complementary to existing or proposed recreational uses, and contribute to the safety and enjoyability of the park, consistent with the Parks Master Plan."

Recommendation: Do not delete the language that protects parks from commercialization and privatization. This recommendation would allow non-profit uses as described in other policies while protecting parks, overall, by using a sound public process and creating adequate public review.

Recommendation: Delete "and contribute to the safety and enjoyability of the park,"

Too many uses can claim that they contribute to the enjoyability of a park, or even the safety - just by being there. All retail uses should undergo public review for compatibility.



PARC Summary

Date: 4/20/2021



City of San Diego Parks Master Plan - November 2020 Draft

Park Standards and the Points System: Analysis & Recommendations

The following is a brief summary of PARC’s Discussion Paper on the subject topic. PARC strongly recommends reading the entire Discussion Paper for a thorough understanding of all of the issues, analysis, and detailed recommended solutions provided in the Discussion Paper.

ISSUES

The Discussion Paper highlights the draft Park Master Plan’s (PMP) proposed elimination of the park land standard (acreage), and demonstrates that the proposed points system is subjective and arbitrary, considers only active recreational uses or amenities while neglecting to recognize the value of parks for passive and unstructured recreation, and systematically discourages and devalues park land acquisition by over-emphasizing recreational amenities.

The paper also explains that combining land and amenities into one scoring system, with 14 points/1,000 residents, creates a closed system, which pits land against amenities. Planning for parks and recreation facilities should not be a zero-sum game, where land and amenities compete with each other. San Diegans need both.

ANALYSIS

PARC believes that the City’s main premise is that the current system is not working based on the lack of progress in providing parks & recreation facilities, particularly in Communities of Concern, and that the City is confusing the current system with the current land standard. We believe that there is nothing wrong with the standard, but that the overall system, which includes the need for more funding and the lack of political will to actually implement the system, is the problem.

The proposed points system ignores the need for more park space while the City’s population is projected to increase by approximately 325,000 by 2050. Knowing land acquisition costs are greater than the cost of constructing most amenities with similar point values, the predictable result is that satisfying the point requirement disproportionately favors amenities. This approach would drastically impact both existing and planned useable park space, resulting in minimal park land acquisition and the potential for parks being overcrowded with active recreation facilities and reduced passive recreation space.

RECOMMENDATIONS

While not endorsing the points system, PARC recognizes City staff's investment in this approach. Therefore, we recommend a holistic Dual System that addresses our main concern, which is retaining the land standard, while also addressing staff's desire to focus attention on the recreational value of amenities and facilities in our parks.

The PMP needs to create an appropriate balance of park land acquisition and intensification of recreation facilities and amenities, and establish minimum standards.

PARC's main recommendations are:

- Separate the Acreage Standard from the points system, and retain the Acreage Standard of 2.8 acres/1,000 residents; it should be its own independent standard. Retain the metric for measuring the acreage standard as actual useable acres.
- Maintain Equivalencies as options to providing traditional park land to meet the acreage standard, and count Equivalencies acreage per the acreage standard. Restore Equivalencies language to the Recreation Element.
- Establish Baseline Amenities for the various types of parks. These would include typical components of the various types of parks, including consideration of the spatial requirements for the components. The standard baseline park components should not receive recreational value credit or points.
- Establish a population-based Enhanced Amenities Standard for achieving a diversity of recreational facilities and opportunities, which different types of amenities provide. These would receive recreational value points. This would be in addition to the population-based Park Acreage Standard and the Baseline Amenities.
- The City should explore ways to improve the points system which could be used for the Enhanced Amenities Standard. A simple and objective approach to insure a transparent and equitable system to measure the recreational value of amenities through a point system could be based on the cost of the amenities. The paper provides a suggestion for determining amenities points by cost.
- The Dual System's total standard would include land (Acreage Standard) + enhanced amenities (Enhanced Amenities Standard).
- Most importantly, we believe that implementation of the standards, including the appropriate mix of land and amenities, should be determined by the citizens of the individual communities. Community members should recommend the types and quantities of the parks and recreational facilities, including the mix of park land and amenities they need and desire, through an informed, transparent, and public process.

ATTACHMENT 3

Appendix A: Examples of PMP Recreational Values of Concern (from Park Standards and the Points System: Analysis & Recommendations)

The proposed equivalent values of developed parks and amenities are arbitrary and irrational. Amenities have equal or higher point values than developed parks of much larger useable acreage. The cost to provide the parks is much greater than the cost to provide the amenities that have equivalent point values.

The following examples compare the point values proposed for various amenities and parks:

- a. A 750 sq. ft. play area is equal to a 1-acre (43,560 sq. ft., or 58 times larger) park (both 7 points).
- b. A Splash Pad (water playground) is equal to a 2-acre park (both 14 points).
- c. An 1/8-acre (5,445 sq. ft.) Off-Leash Dog Area is equal to a 1 ½-acre (65,340 sq. ft., or 12 times larger) park (both 10.5 points).
- d. A Basketball Court or Sand Volleyball area is equal to a 1-acre park (both 7 points).
- e. 3 pieces of Fitness Circuit equipment are equal to a 1-acre park (both 7 points).
- f. A Bocce Court is equal to a 1-acre park (both 7 points).
- g. A 5,000 sq. ft. Performance/Event Space is equal to a 3-acre park (130,680 sq. ft., or 26 times larger) (both 21 points).
- h. A 10 sq. ft Interpretive/Educational Sign or display is equal to a 1-acre park (both 7 points).
- i. A park of any size connected to a Class 1 Bicycle Track (21 points) and located within 500 feet of a transit stop (14 points) is credited with a total of an additional 35 points, which is the equivalent of an additional 5-acre park (35 points).