



THE CITY OF SAN DIEGO

REPORT TO THE PLANNING COMMISSION

DATE ISSUED: July 9, 2007 REPORT NO. PC-07-099

ATTENTION: Planning Commission, Agenda of July 19, 2007
Park and Recreation Board, Agenda of July 19, 2007

SUBJECT: Draft General Plan Update Recreation Element - Park Equivalencies

THIS IS A JOINT WORKSHOP ITEM; NO ACTION IS REQUIRED BY EITHER THE BOARD OR COMMISSION AT THIS TIME.

SUMMARY

The purpose of this workshop is to conduct an open discussion about how to implement new proposed policies recommended in the Draft General Plan Update Recreation Element regarding park Equivalencies, including Alternatives and Enhancements, all directed towards the equitable provision and distribution of, and access to, park and recreation services citywide. In land-constrained neighborhoods or communities, it can be extremely difficult and/or expensive to secure new park land; Equivalencies may provide options. The Park and Recreation Board and Planning Commission discussion is intended to help staff determine if the full range of issues is being identified for evaluation.

BACKGROUND

Staff has made several informational presentations and conducted workshops with the Board and Commission over the past year. Refinements have been made to the policies as a result of these meetings, as reflected in the October 2006 draft document. The subsequent public hearing draft will provide further changes and refinements to policies in the Recreation Element.

The current draft Recreation Element acknowledges that variations exist among communities with respect to the total park and recreation facilities and population-based park acres existing and planned. As the city evolves into a fully urbanized environment and land costs rise, the need for creative solutions to meet park and recreation needs, while maintaining housing affordability, has become increasingly important. Research indicates other cities are grappling with this issue and developing similar policies – notably Miami, San Francisco and Los Angeles. Of primary concern is how to provide park and recreation facilities in older, urbanized neighborhoods, that developed prior to current park standards, where there is limited undeveloped land readily available, a lack of funding resources to enable opportunistic acquisitions, and dual objectives for providing affordable housing and park land. The current draft does not recommend changing the existing minimum standards for population-based park acreage (2.8 acres /1000 population) or service distance.

However, it does recommend policies to allow for flexibility in applying population-based guidelines, including the concept of “Equivalencies.” (See Attachments 1, 2 and 3.)

Equivalencies could be in the form of:

- 1) “Alternatives,” a category of improvements that provide additional park acreage or recreational space not currently counted in the population-based park inventory; or
- 2) “Enhancements,” which are physical improvements that expand or increase the intensity of use or range of activities available at an existing park or recreation facility.

There would be built-in safeguards to limit the use of Equivalencies and to apply appropriate values in order to give credit for meeting population-based park guidelines and standards. Under the latest draft of the Recreation Element, safeguards would include restrictions, such as:

- A) No more than 50% of a community’s required population-based park acreage could be achieved through application of a combination of Alternatives and Enhancements. (Note: on June 19, 2007, the Community Planner’s Committee (CPC) voted to reduce the maximum Equivalency to 25%; staff is seriously considering this percentage, and seeks your input.)
- B) The preparation of Findings made and approved by the City which clearly demonstrate how park requirements cannot be met through traditional methods and the benefit to the community of applying Equivalencies to meet required park acreage, recreational facilities and/or infrastructure.

DISCUSSION

While the provision of increased park acreage in underserved communities would remain the first priority, the use of Equivalencies would be considered only after the ability to provide traditional population-based park acreage and facilities, in the form of neighborhood and community parks, recreation centers and aquatic centers, has been determined to be infeasible. The appropriateness and extent of proposed Equivalencies would be evaluated on a case-by-case basis, as opportunities present themselves, with community input.

Equivalencies could be considered for both publicly and privately initiated projects. Both types of projects would be subject to the same criteria (see *Equivalency Options*, below), including the methodology for applying Equivalency credit. Where Equivalencies are being considered for satisfaction of developer requirements, this would occur at the time of discretionary permit approval.

Equivalencies could provide a mechanism to achieve more timely provision of park and recreation facilities and improvements. For example, by formally allowing clearly identified and predetermined qualifying portions of resource-based parks to receive credit for satisfying population-based park requirements where they can provide typical neighborhood or community facilities, we open the door to funding sources for resource-based park improvements which have not been available in the past. By formally identifying these areas as potentially meeting

population-based park standards as recommended in the Recreation Element, we can create projects that would be added to the adjacent communities' Public Facilities Financing Plans whose development costs would be included in determining the basis of the Development Impact Fee (DIF.) Since DIFs can only be collected to provide for the population-based park and recreation infrastructure for new residential development, this funding source currently cannot be used in a resource-based park unless the improvements are classified as serving population-based needs. (Balboa Park, Mission Bay Park and Presidio Park are examples of resource-based parks.)

This concept is being applied in the Downtown Community. As you know, last year the City Council approved the Downtown Community Plan Update which identified specific portions of Balboa Park as meeting some of Downtown's future residents' population-based park needs. Now, we are in the process of creating specific projects within the southern and western areas of Balboa Park which have the potential to serve those residents' neighborhood and community park needs. These projects include the redevelopment of the City Operations Yard at 20th and B Streets into useable park acreage (in accordance with the approved East Mesa Precise Plan), and picnic areas on Inspiration Point. These projects will be funded by the DIF collected from Downtown developers.

Council Policy

The draft General Plan recommends a policy that establishes the use of Equivalencies as playing a role in providing timely park facilities in certain circumstances. It also calls for the creation of a comprehensive citywide Parks Master Plan, which would include Equivalencies implementation criteria. The Parks Master Plan effort is expected to take 2 – 2 ½ years from start to completion. The determination of what is an equitable use of Equivalencies for all parties involved is a deliberative process, and staff would develop detailed interim policy guidelines in the form of a Council Policy, as recommended by the draft General Plan, for implementation in the absence of a Parks Master Plan, and ultimately to be incorporated into the Parks Master Plan.

The Council Policy would include the criteria for applying Equivalencies, and how the equivalent facilities would be quantified and recorded in the population-based park inventory, and would be fully vetted through a series of public meetings devoted to that purpose. The public review of the draft Council Policy will occur independently from the General Plan Update public review process, and may occur either concurrently or after the General Plan Update is approved by City Council. It is anticipated that the preparation of the draft Council Policy and the public input process will begin promptly following this joint Planning Commission and Park and Recreation Board Workshop, and will include the Park and Recreation advisory committees, task forces, the Park and Recreation Board, Community Planners Committee, Planning Commission, City Council Committees and, ultimately, the full City Council.

Equivalency Options

PRESENTED BELOW FOR YOUR CONSIDERATION IS A LIST OF THE DIFFERENT TYPES OF EQUIVALENCY OPTIONS TO POSSIBLY BE ADDRESSED BY THE COUNCIL POLICY.

Where applicable, a discussion of one or more approaches for developing each set of options, followed by the pros and cons of each to support discussion, is also presented. Any combination of the options is possible, but a simpler structure is desirable to facilitate and ensure implementation.

Option A: Establishing Acreage Credit for different types of Equivalencies

A method for determining acreage credit for different types of proposed Equivalencies needs to be established. Alternatives are the preferred of the two categories of Equivalencies (over Enhancements,) since adding park land and facilities, rather than enhancing existing facilities, is the primary goal of the Equivalencies policy. Therefore, it follows that Alternatives should receive more credit than Enhancements. Additionally, within the Alternatives category, consideration should be given to applying different amounts of credit to the different types of Alternatives.

Examples of credit in the Alternatives category could be: Mini parks and joint use areas could receive 100% credit of their measured acreage; all other Alternatives could receive 50% credit of their measured acreage. See below for a discussion of how credits could be applied to resource-based park equivalencies. Enhancements could receive 25% credit of their measured acreage or square footage. (See Draft Equivalency Credit Table, Attachment 4.)

Approach 1 – Uniform Credit Application: All types of Equivalencies (Alternatives and Enhancements, and sub-categories of each) could receive 100% credit of the total measured acreage being applied.

Pros: This is a straight forward approach. Using this simple method may encourage the use of Equivalencies to supplement traditional park land.

Cons: This approach may act as a disincentive to encouraging earnest efforts to provide standard parkland, and/or to providing the preferred types of Equivalencies.

Approach 2 – Variable Credit Application: In this method, a hierarchy of preferred Equivalency types could be established. Credit application could vary for the different types of Equivalencies.

Pros: This approach may offer flexibility in the combination of Equivalencies being provided, and establishes incentives for the provision of the preferred types of Equivalencies.

Cons: This value system may be more cumbersome to use and discourage the use of Equivalencies.

Option B: Recreational Value for Equivalencies

Recreation value attempts to assess improvements regardless of quantifiable acres, yet a method for measuring credit for proposed Equivalencies needs to be established. Measurement methods must be able to be converted into acreage amounts, since the population-based park standards are based on an acreage-per-thousand-residents formula.

Approach 1 - Dollar Value: The acreage credit applied to the proposed Equivalency could be calculated as a ratio of its total cost relative to the cost of acquisition and development of one acre (or one square foot) of typical population-based park land and/or facilities in the particular community.

Pros: This is a straight forward approach, based on typical park development costs, and land values to be established for each community.

Cons: This approach may act as a disincentive to the provision of higher cost amenities where they are needed or desired.

Approach 2 - Utility Value: The acreage credit applied to the proposed Equivalency could be calculated as a ratio of the total proposed units of utility or recreational value relative to the number of people served. This value system could be based on a combination of the following: 1) intensity of use or number of residents served by the facility, 2) the variety of the uses the facility can support, and/or 3) the amount of time the facility is anticipated to be used. A table of relative values for different types of facilities could be prepared.

Pros: This approach may offer flexibility and incentives to the provision of typically higher cost amenities where they are needed or desired.

Cons: This value system may be more cumbersome to use. It may also be considered arbitrary, or be more subject to interpretation and subjectivity than the Dollar Value approach.

Option C: Equivalency Applications in Qualifying Portions of Resource-Based Parks

While resource-based parks are intended for city-wide use, it is acknowledged in some community plans that small areas of these parks also serve the needs of residents in adjacent communities.

Only small portions of resource-based parks with typical population-based park components or facilities may qualify for being credited as Equivalencies in adjacent communities. The following types of criteria need to be established to guide this process:

Criterion 1 – Consistency with adopted land use plans: Design and use of Alternative sites located within resource-based parks must be consistent with any applicable park master plans or land use policy documents (e.g., Balboa Park Master Plan, East Mesa Precise Plan, and Mission Bay Park Master Plan Update.)

Criterion 2 – Locational criteria and contiguity to the credited community(ies):

Equivalency sites within resource-based parks must meet population-based park locational criteria (service radius) in order for the contiguous community to receive credit towards satisfying its population-based park acreage requirements.

Criterion 3 – Maximum total acreage: A method for determining the maximum permissible total acreage of useable park land that can receive Equivalency credit within a given resource-based park would need to be established. Together with other criteria, this would insure that the integrity of the regional nature and visitor use of the resource-based parks are maintained while also acknowledging and providing opportunities for use by local residents.

Criterion 4 – Variable credit application: Consideration should be given to whether or not credit is applied uniformly to resource-based parks.

Approach 1: Apply credit amount uniformly for Equivalencies in all resource-based parks. Regardless of usage, a credit amount of 100% or less (80%, 50%, etc.) would be established.

Pros: This simple approach could consider all Equivalencies in resource-based parks equally.

Cons: This approach may not accurately reflect the actual ratio of local/visitor users.

Approach 2: Adjust the amount of credit to be applied based on the ratio of local/visitor usage. This could be determined by hours of usage, or quantity of each type of user (local or visitor.) The methodology and formula would need to be developed.

Pros: This approach could more accurately reflect the actual ratio of local/visitor users, thereby more equitably applying credit.

Cons: This approach may prove to be cumbersome, or inaccurate depending upon the level of surveying or analysis conducted.

Option D: Location qualifications

Alternative sites must meet population-based park locational criteria (service radius) in order to receive credit towards satisfying the population-based park acreage requirements of a single community. Population-based park locational criteria do not apply to amenity-based facilities (e.g., skate parks, sports field complexes, off-leash dog parks, etc.) that serve multiple communities.

Option E: Enhancement qualifications

A comprehensive list of qualifying Enhancement types, or criteria used to determine qualifying characteristics of Enhancements, would need to be established. A list of standard facilities typically

included in population-based parks would be prepared; these facilities would not be eligible for Enhancement credit.

Monitoring the Application of Equivalencies

The City Planning and Community Investment Department maintains an electronic, population-based park acreage and recreation facilities inventory for each community planning area. Acreage credit for applied Equivalencies can be easily registered and monitored to ensure that maximum thresholds are not exceeded in either category of Equivalencies. (See Attachment 5 for an example.)

CONCLUSION

Staff recognizes that the proposed use of Equivalencies to help satisfy population-based park requirements is controversial and that there are pros and cons to this approach. The development and adoption of the preceding types of options would provide the framework for evaluating their appropriateness and applicability. The use of Equivalencies can provide a solution to the reality of trying to meet population-based park standards in nearly built-out and densely populated urban communities.

Ultimately, the Parks Master Plan will provide the comprehensive blueprint needed to ensure that population-based parks and facilities are equitably distributed citywide, and further refine the application criteria for Equivalencies.

Staff is seeking your guidance on the preceding concepts, including the following questions:

1. Should 100%, 50% or 25% of a community's required population-based park acreage be the maximum credit that could be achieved through the application of Equivalencies?
2. Should Acreage Value (Option A,) Recreation Value (Option B,) or a combination of both be considered in establishing Equivalencies criteria?
3. Should the Dollar Value or Utility Value approaches be considered for Option B: Recreation Value?
4. Are the various criteria proposed for Equivalency applications in resource-based parks valid?

Respectfully submitted,

William Anderson, FAICP
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Attachments:

1. Draft Recreation Element Excerpt from page RE-27
2. Draft revised Recreation Element Table RE-3
3. Draft revised Recreation Element Policy RE-F.10
4. Draft Equivalency Credit Table*
5. Draft Greater North Park Population-based Park Acreage Inventory (example)*

* These attachments are preliminary draft examples for discussion and illustrative purposes only, and are subject to revisions as a result of the public review and approval process.