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- Groundwork San Diego • Oak Park Community Council • Outdoor Outreach • San Diego Canyonlands • San Diego Coastkeeper • San Diego County Bicycle Coalition • Sierra Club
- Southeastern San Diego Planning Group • Webster Community Council

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RE: City Park Master Plan

June 8, 2021

Dear Mayor Gloria and Councilmembers,

The Draft Parks Master Plan (PMP) demonstrates a significant equity focus in its proposed policies, in the creation of a pooled Citywide DIF fund, and the weighted allocation of those funds towards Communities of Concern in an effort to redress historical spending inequities. The Chollas Creek Coalition understands that the Points Value System enables this Citywide DIF pool, which in turn enables the weighted spending policy. For this reason, the CCC accepts the Points Value System as a necessary component of an equity-focused PMP with regard to the distribution of DIF.

However, all abstracted value systems, whether acreage-based or points/amenities-based, only propose to measure relative parity of one value category, which is to say acreage vs. acreage, or amenity vs. amenity. A value standard system may be a legal necessity for determining DIF, but standardized systems cannot measure the multivariate, nuanced, and **necessarily qualitative**, nature of park equity with disparate expressions in each community of San Diego. Therefore, no value system, including the proposed Points Value System, is sufficient for measuring equity. It is only sufficient for measuring parity of expenditure on identified amenities, not the **equity value** of those amenities between communities. For instance, park lighting that improves access in an already- safe neighborhood is not equal to park lighting in a neighborhood characterized by criminal activity that renders night-time use unfeasible. Another example is access to transit. Where is the data that shows that transit will be used to connect

underserved communities to distant resource parks like Mission Bay Park? Giving **equity value** points to transit connections sounds good on paper, but in practice is problematic and not supported by evidence.

The only way to ensure equity in parks planning is to let the underserved communities speak for their own needs, and, drawing from an equitable public input process, develop a priority project list which can then be budgeted. The projected 30% CoC DIF expenditure, plus expected general fund expenditure, should be measured against the CoC Priority Project List to determine the budget gap. This budget gap represents an **equity gap**, the most realistic park equity analysis possible.

Coalition members have worked closely with City staff and stakeholders to develop specific recommendations for strengthening the PMP equity goals. Our objectives are to identify community-specific recreation needs and priorities; outline opportunities for providing recreation space in areas with limited land; create funding strategies to implement the PMP, including phasing and success metrics. We are suggesting changes to the PMP and the Resolution Adopting a new Citywide Park Development Fee and have provided these in the attached memorandum. We will also soon be submitting recommendations for more effective and inclusive City community engagement best practices.