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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

MEMORANDUM

DATE: June 8, 2021

SUBMITTED BY: Chollas Creek Coalition

TO: Mike Hansen, Director, City of San Diego Planning Department

SUBJECT: Draft Parks Master Plan Review Comments and Recommendations

As you may be aware, the Chollas Creek Coalition is comprised of members affiliated with a broad spectrum of resident leaders and organizations committed to achieving social, environmental, and economic justice throughout the Chollas Creek communities which comprise the Mid-City area, Southeastern San Diego, Encanto and Barrio Logan. The Chollas Creek Coalition commends City staff for working over the past six months on amendments to the Parks Master Plan and its focus on equity. The inclusion of Chollas Creek as a proposed regional park is an initiative for which we have long advocated. This designation will serve as the catalyst for a Chollas Creek Regional Park master plan to unlock the potential of this amazing regional resource.

After our review of the revised Parks Master Plan issued on June 1, 2021, our Coalition would like to offer additional recommendations for consideration by City staff. As we understand it, this initiative is not only an update to the City's Parks Master Plan that was last updated in 1956, but is also creating a new development impact fee structure for future residential development

as part of the Complete Communities Initiative. In order to fully address inequities and opportunities that our urbanized communities have faced over the past 60 plus years, we ask that staff incorporate the following into the draft revised Parks Master Plan, General Plan amendment and Development Impact Fee Resolution.

Parks Master Plan Amendments:

1. As part of Section 4.8: **“Non-Profit Programming Working Group:** Include the following language: “with the objective of creating a streamlined park development process that is less than 5 years from design inception to project completion by amending Council Policy 600-33 (Parks General Development Plan process) that is administered by the Planning Department.
2. Revise the walk and bike shed analysis in communities that have higher crime rates and poor infrastructure to include a commitment to public safety considerations – this analysis only works in affluent communities that have adequate infrastructure and low crime rates, making it inherently inequitable.
3. Amend AV-4, to allow for for-profit restaurants and other food establishments. As already is the case, any retail food sales, whether for-profit or non-profit, must be approved by the County Dept. of Environmental Health, Food & Housing Division.
4. Within six months of adoption of the PMP, create a community-by-community implementation project list based on Community Plan Recreation Elements from 2015 forward that includes:
 - a. A community facilities deficiencies cost matrix by examining total cost to construct modern facilities for both existing and future parks;
 - b. A matrix that clearly defines how parks and facilities are prioritized in the parks master plan;
 - c. An implementation matrix of how existing DIF funds and other dollars will be expended that clearly defines the budget gap for full implementation.
 - d. The Implementation Plan should be presented to the City Council on an annual basis in the Fall so that new project funding can be prioritized by the City Council for the following budget cycle. It will include an analysis of progress made towards meeting specific Communities of Concern equity goals.
 - e. A website for each community should include a GIS-based map that provides for the existing parks resources as well as future projects that includes a timeline and funding source for the improvements to be completed.

f. Provide an explanation as to how the 100 acres was determined to be sufficient over the next 10 years and identify where the 100 acres will be developed.

g. Create a matrix to determine outdated general development plans contained with the communities of concern in order to have their GDP's updated in priority set by the community but in no instance should it be beyond five years from adoption of the PMP.

6. Confirm that the proposed per square foot cost for Recreation and Aquatic Centers is still current in order to determine if the City-wide Development Impact Fee needs to be adjusted to account for a higher per square foot cost.

7. Revise the points system to reflect the following:

- a. The age of a parks facility should dictate the number of points it receives; facilities built prior to 1990 should not receive any points
- b. Transit access should not be included in the points system.

8. The General Plan map includes Mount Hope Cemetery as a county island which is in direct conflict with the draft parks Master Plan which shows this area as a resource-based park. Since the cemetery is within the City of San Diego's jurisdiction and is a commercially-run business, the cemetery should not be considered a resource-based park and all exhibits both in the General Plan and Parks Master Plan should be amended.

City Resolution Adopting a Citywide Park Development Fee Amendment Request:

- Whereas a designated portion of the General Fund to be determined by the City Council will fund the Parks Master Plan
- Whereas the Implementation Plan shall be presented to the City Council on an annual basis in the Fall for appropriation of funding so that new project funding can be prioritized by the City Council for the following budget cycle.
- Amend this section to eliminate the five-year period: "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 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."



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Attachment

Parks Master Plan Equity Issues

1. 100 Acre Goal

The plan states that “As an outgrowth of the City’s new vision for **Parks For All**, an ambitious new goal for acquiring parkland has been set. The goal is for the City to acquire 100 acres in the first ten years following the Parks Master Plan’s adoption. This goal will help us to provide parks and places for recreation where the needs are the greatest.” The number of acres seems insufficient; acquisition targets must be included with specific reference to Communities of Concern; decision-making for acquisition should be defined and be part of the Implementation Plan.

2. Point Based System

The revised parks master plan assigned a Recreational Value-Based Park Standard (Value Standard) standard to represent recreational opportunities within population-based parks. A recreational value of 100 points per 1,000 people represents a range of recreation experiences comparable to the opportunities available to residents in communities that previously achieved the acreage-based standard.

As a case in point, City staff conducted an assessment of parks throughout the City. As shown in Appendix E, the Carmel Valley Towne Center Community Park is assigned 350 points. Staff also conducted an analysis of the 17-acre Southcrest Community Park. Staff assigned a total of 371 points to Southcrest Park. The General Development Plan for Southcrest Park was completed in 1949 and the park and recreation center was constructed in 1964 with no new structures having been completed in the park since then. The Carmel Valley Community Park was built in 1999. It has modern amenities to meet the programming needs of the entire community.

The primary question that arises is, why are equal points assigned for facilities when the age and condition of said facilities are so vastly different? If the points system is to be adopted, it needs to

reflect the age and condition of the park and the facilities. As is proposed, the points system is comparing apples to oranges at a significant cost to the communities of concern.

3. 10-20-30-40 minute Walk and Bike Sheds

The idea of walk sheds in the parks master plan is a noble consideration. However, in many of the communities of concern, a family's concern for safety due to the lack of lighting, poor street infrastructure, and crime deters them from being able to walk or ride to parks and recreation centers.

Case in Point: Many children and families in Barrio Logan will not cross over Interstate 5 to go to Memorial Park because of the public safety issues as well as the poor lighting and infrastructure. Therefore, in communities of concern, language needs to be amended to include the need for more investment in safe infrastructure that embraces CPTED design principles.

4. Community Plan Updates

The Parks Master Plan suggests that regional assets are intended to be evaluated during future community plan updates.

Case in point: Over the past 7 years, there have been multiple plan updates that have been adopted and include relevant Park Elements that should be relied upon to drive what should be funded in relation to parks. These current and updated Recreation Elements should be used as the basis for the implementation matrix.

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6. Recreation Centers and Aquatic Complexes

As illustrated in the [Citywide Park Development Impact Fee Nexus Study](#), the unit cost for an aquatic center is approximately \$335 a square foot and the unit cost for a recreation center is \$692 a square foot. These costs are factored into the proposed Citywide Parks DIF fee. These per square foot costs seem very low in relation to the cost to build new facilities with prevailing wage. Furthermore, the Planning Department should be aware of exactly how many new recreation centers and aquatic complex's will be required to meet existing and future needs. This should be accounted for in the new City-wide Parks DIF fee rather than provided as a generalized number and leads to the initial request for an implementation plan to be adopted as part of the parks master plan.