



Analysis of Park and Recreation Requirements Resulting From The Proposed Downtown Community Plan

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quality of life through effective growth management*

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Summary: The Downtown Community Plan, as written, would create an infrastructure deficit for parks and recreation of about \$8.5 billion.

It may not be financially feasible to double the current non-residential space and triple the current residential space, while providing needed infrastructure and public facilities.

This analysis is based on

- existing General Plan standards
- the draft Downtown Community Plan ("Plan") dated June 2005
- information provided by the Park and Recreation Dept in their letter to CCDC dated 9/12/05
- the Centre City Public Facilities Financing Plan dated 4/1/05 (used to determine the cost of acquiring and developing parkland downtown, and the park demands from non-residential development)

General Conclusions

1. The existing General Plan standard for "population based parks" (Neighborhood and Community Parks) is a range of 2.8 to 4.0 acres per 1000 residents. This range is derived from the number of people to be served by each type of park, and the minimum park size.
2. City staff have ignored this range by using a figure of 2.8 acres per 1000 residents. It's not clear if that was authorized by the City Council.
3. The Planning Department sometimes uses a further reduced standard of 2.4 acres. Likewise, it's not clear if they have legal authority to make this change. CCDC, apparently following the lead of city staff, uses the figure of 2.4 acres in their Plan.
4. The Park and Recreation Department, in their 9/12/05 letter to CCDC, conclude that downtown would need 249.5 acres of parks for the proposed 89,100 residents, using the current standard of 2.8 acres per 1000 residents, which represents the low end of the range.
5. The Downtown Plan states that there are 78.9 existing, 25.5 pipeline, and 26.4 acres proposed, for a total of 130.8 acres.
The problem is that many of the sites that they count do not meet the city's definition of useable park land.
6. The Park and Recreation figures, dated 9/19/05, that were attached to their letter, show 46.71 acres existing, 30.17 future acres (pipeline and proposed), for a total of 76.88 acres.
This leaves a shortfall of 172.62 acres. We can conclude that the CCDC plan includes only about 1/3 the needed parks for downtown residents.
7. Park demand from non-residential space.
 - a. The Park and Recreation Department traditionally plans parks based on resident population in a community. However, downtown has very sizeable numbers of workers, projected at 167,700 employees, occupying 53.231 million sq ft of non-residential space. This non-residential space also generates significant number of customers, visitors to government buildings, hotel guests, tourists, and students. "Workers" is used in this analysis as a simplified term to represent all the demands due to non-residential development.

b. Fortunately, the financial staff at CCDC and the City recognized that these workers create demand for park and recreation facilities also. The Centre City Public Facilities Financing Plan established an equivalency of 0.50 housing units per 1000 sf of Gross Building Area (GBA). **Thus the proposed total of 53.231 million sq ft of non-residential GBA would add an amount to park demands that would be equivalent to 26,615 housing units.** (53,231 thousand sq ft x 0.5).

c. We can convert this additional demand to a population figure by noting that the expected household size in 2030 is 1.67 people per dwelling unit. **This means that the added park demands from downtown workers would be the equivalent of 88,900 residents** (53,231 Equivalent Dwelling Units times 1.67 people per unit).

d. Using the existing standard of 2.8 acres per 1000 people, we find that downtown workers would create a demand for 248.9 acres of parkland (88,900 equivalent residents times 2.8)

8. Combined park requirements for downtown residents and workers. It is apparent that the park requirements generated by non-residential development have been overlooked by the Park and Rec Department in their calculations. When we combine the two sources of demand, we find that the park requirements for downtown are twice as large as estimated.

Parkland required by 89,100 residents	249.5 acres
Parkland required by non-residential demand	248.9 acres
Total park demand from residential and non-residential sources	498.4 acres

9. When compared to the 76.88 acres of usable parkland, including existing, pipeline and proposed, as calculated by the Park and Recreation Department, **we can see that the proposed Downtown Community Plan is short 421.52 acres of parks.**

10. Cost per acre. The Centre City Public Facility Financing Plan estimates that it will cost \$218 million to acquire and develop 10.8 acres of downtown parks. This calculates to \$20.2 million per acre of finished park.

11. Let's assume that CCDC can provide all the money needed for the 76.88 acres of usable parkland planned, and look just at the additional acreage as calculated above.

a. Residential. 172.62 acres of park shortfall for residents, as calculated by the Park and Rec Dept, x \$20.2 million per acre, as estimated by CCDC, equals \$3.487 billion. **So it would cost \$3.487 billion to bring the Downtown Community up to existing park standards, for the residential portion of downtown.**

b. Non-residential. Note that no park acreage has been planned to meet the demands of downtown's non-residential users, as an addition to residential demands, even though non-residential development is being charged impact fees for each 1000 sf of space. If we use the CCDC cost estimate of \$20.2 million per acre of developed parkland, and multiply by the 248.9 acres of parks attributable to non-residential demands, we find an additional cost of \$5.028 billion.

It would cost \$5.028 billion to provide the park land needed by the total non-residential development proposed in the Downtown Community Plan.

c. Residential plus non-residential park requirements would cost about **\$8.5 billion**, by combining (a) plus (b) above. This is the deficit, not the total cost, as we have assumed in paragraph 11 above that CCDC has a plan to pay for the 76.88 acres of useable parkland.

12. In conclusion, to meet the park needs of proposed downtown residents, plus the park needs of non-residential uses, would cost about \$8.5 billion more than currently identified by CCDC.

13. What can be done? This figure could be reduced in several ways:

a. If new development projects were required to provide on-site recreational facilities, such as swimming pools, tennis courts, volleyball courts, jogging tracks, exercise rooms etc, then the requirements for public parks could be reduced somewhat. (As a caution, we must remember that attached housing does not include private yards, and rely on open space that is primarily public. So city planners should not get carried away with the idea that indoor facilities are the equivalent of parks. Indoor facilities could reasonably be counted towards a small portion of public park requirements.)

b. If park land can be acquire adjacent to downtown, where land prices are lower, the cost per acre can be reduced. As an example, a

large park and playing field complex could be located in Golden Hill, Barrio Logan or Uptown communities, close to the downtown boundaries, but still convenient to downtown residents and the non-residential visitors also. Picture another Robb Field, or the equivalent in smaller pieces.

c. Reducing the park standard from a range of 2.8-4.0 acres per 1000 residents to 2.4 acres would result in a 14% reduction in the calculated park requirements. However, this would have to be justified by a study of recreation needs of downtown residents, and would apply only to downtown. A reduction in park standards could set a bad precedent for other communities, and embolden city staff to periodically lower park standards in the future, as they have done in the past. For any reader who thinks that a park standard of 2.4 or 2.8 acres of parks per 1000 people may be excessive, consider that the standard recommended by the National Recreation and Parks Association for neighborhood and community parks is 6 to 10 acres per 1000 people, not including regional parks.

d. A reexamination of non-residential demands on park and recreation may be warranted. Such a study might conclude that the equivalency factor included in the Financing Plan is incorrect.

14. If we examine the existing Centre City Public Facilities Financing Plan, with it's provision for 10.8 acres of parkland, it becomes apparent that the existing Financing Plan is incredibly outdated and inadequate. There are obvious shortcomings in the amount of parkland planned, especially after considering the large density increased proposed in the Downtown Community Plan. This Financing Plan was probably inadequate even based on the 1992 Community Plan.

The serious flaws in this Financing Plan reveal a compelling need to plan public facilities and their financing before adopting the proposed Downtown Community Plan. A plan with reduced scope would reduce the public facilities requirements and the associated financial burden. After a thorough financial study, which hasn't been done yet by the city, it may prove financially infeasible to double the current non-residential space and triple the current residential space, while providing needed infrastructure and public facilities.

15. Friends of San Diego has provided evidence to the city that the methods used in all the city's Public Facilities Financing Plans are flawed, including the Centre City plan. The methods are illogical and inconsistent with General Plan policies. This leads to the conclusion that parks, fire stations, libraries and local transportation facilities are all being planned improperly. Friends of San Diego has also prepared a report summarizing the huge loss of potential revenue due to Development Impact Fees that are unnecessarily low.

16. The Report of the City's Independent Budget Analyst dated 2/22/06 states that the financial impacts of the proposed Downtown Community Plan are mostly unknown. The report addresses up-front capital costs, operating and maintenance costs. This analysis from Friends of San Diego includes only the capital costs of parks, and does not evaluate the additional costs of operating and maintaining downtown parks and recreation facilities.

17. It is the conclusion of this report, based on figures provided by CCDC and the city, that to adopt the Downtown Community Plan as written would create an additional infrastructure deficit of \$8.5 billion for parks and recreation.

This figure does not include infrastructure costs and possible deficits for transportation, libraries, police stations, water and sewer infrastructure, mitigation of air and water pollution, affordable housing impacts, etc.