

**Date:** January 11, 2022

**To:** Growth Management Citizens Committee (and members of the public)

**From:** Steve Linke, Traffic & Mobility Commission representative

**Subject:** Open space and parks

After considering feedback from staff, the committee, and the public, below are my proposed committee recommendations on “open space” and “parks.”

Note first that growth management as envisioned when it was first adopted in 1986 is no longer possible, because the main enforcement mechanism (a development moratorium) is no longer allowed. Therefore, I would suggest that the proposed open space and parks standards are not really **minimum standards** that **must** be met **immediately**, but rather **goals** to which **best efforts** should be applied **over time**.

In addition, while **developers** should continue to be required to **dedicate a portion of their property** and/or **pay their fair shares in fees**, it is evident that the limited resources available solely from them through growth management will typically be insufficient. Accordingly, the **city** needs to **help fund** achievement of the goals with an emphasis on deficient areas.

Given these paradigm shifts in growth management, I think our committee can recommend more meaningful open space and parks standards/goals and ignore much of the noise about the inability to guarantee compliance and the other naysaying regarding the ability to pay for and build these important projects. We also can recommend strategies to help prioritize the projects.

### **Open Space**

Proposed Goal: “Fifteen percent of the total land area in the Local Facility Management Zone (LFMZ) exclusive of environmentally constrained non-developable land for all LFMZs, including the previously exempted LFMZs 1-10 and 16.”

- Developers in the deficient zones shall make fair-share contributions toward the 15% open space goal by dedicating property (either unilaterally or through a developer agreement) and/or paying an open-space in-lieu fee.
- As part of ongoing growth management monitoring, the City shall:
  1. keep the open space in-lieu fee updated to reflect current needs and costs;
  2. identify deficient LFMZs;
  3. maintain an inventory of candidate parcels (undeveloped or underutilized) within the deficient LFMZs and proximal LFMZs that could be acquired to help address identified deficiencies;
  4. prioritize projects based on the magnitude of the deficiencies; and
  5. account for projected future loss of open space due to sea-level rise.

## Parks

Note that 3 acres of parkland per 1,000 residents is apparently a State of California minimum, that multiple adjacent cities seem to have a goal of 5 acres of parkland per 1,000 residents, and that cities including Oceanside have conducted “parkshed analyses” to identify and prioritize areas that lack sufficient parks.

Proposed Goal: “4 acres of dedicated parkland per 1,000 population with all residences within a 10-minute walk of a park.” [The **4-acre** goal number could be flexible up or down based on what is counted as parkland (see below), and the **10-minute** walk number could be flexible.]

- Developers shall make fair-share contributions toward the 4 acre per 1,000 residents parkland goal by dedicating property (either unilaterally or through a developer agreement) and/or paying a park in-lieu fee.
- As part of ongoing growth management monitoring, the City shall:
  1. keep the park in-lieu fee updated to reflect current needs and costs;
  2. identify deficient areas (i.e., quadrants with less than 4 acres per 1,000 residents and LFMZs with residences greater than a 10-minute walk from a park);
  3. maintain an inventory of candidate parcels (undeveloped or underutilized) within the deficient areas that could be acquired and developed to help address the deficiencies;
  4. prioritize projects based on the magnitude of the deficiencies; and
  5. account for projected future loss or parkland due to sea-level rise.

### ***What should be counted as parkland?***

- **Areas inaccessible to people:** Such acreage (e.g., protected habitat) should not count as city parkland, even if it is contiguous with a park (e.g., Poinsettia, La Costa Canyon, Carillo, Hidden Valley, and Veterans Memorial Parks).
- **Veterans Memorial Park:** Even the accessible acreage of Veterans Memorial Park should apply only to the northwest quadrant where it is located—not all four quadrants—because, despite its size, the city modified its role from a regional park to a neighborhood park.
- **Private development parks:** This acreage is meant to compensate for developments that do not provide adequate yard space for their individual dwelling units and is restricted to members only, so it likely should not count as city parkland.
- **Schoolyards:** Those that are inaccessible for major parts of the day or are subject to being withdrawn from public use by schools likely should not be counted as city parkland, or only a portion of the acreage should be counted.
- **Golf courses and trails:** These are counted as parkland in Oceanside, but Oceanside has a goal of 5 acres per 1,000 residents. Also, it could be argued that golf courses are really not accessible to all people. These are debatable.
- **Beaches; Agua Hedionda lagoon inner basin:** These types of areas do not seem to be routinely considered parkland in other jurisdictions, but these also are debatable.