


INFORMATIONAL BOARD REPORT

CITY OF LOS ANGELES  
DEPARTMENT OF RECREATION AND PARKS

November 20, 2025

TO: BOARD OF RECREATION AND PARK COMMISSIONERS

FROM: JIMMY KIM, General Manager 

SUBJECT: VARIOUS COMMUNICATIONS

The following communications addressed to the Board have been received by the Board Office, and the action taken thereon is presented.

<u>From</u>		<u>Action Taken</u>
1. Palisadian comments regarding the New Rec Center Turf Fields	#9982-452	Referred to General Manager
2. Malihe Shamayeli comments regarding Violations at Orcutt Ranch	#9998	Referred to General Manager
3. Alex Crow/Griffith Park Advisory Board comments regarding Griffith Park Pony Rides	#9999	Referred to General Manager
4. Alex Crow/Griffith Park Advisory Board comments regarding Council File 25-1034	#9999a	Referred to General Manager
5. Alex Crow/Griffith Park Advisory Board comments regarding Park-Closure Policy	#9999b	Referred to General Manager
6. Alex Crow/Griffith Park Advisory Board comments regarding Travel Town Parking	#9999c	Referred to General Manager
7. Arlene Johns comments regarding Spring Street Park	#10000	Referred to General Manager
8. Klaus Havelaund comments regarding Spring Street Park	#10000a	Referred to General Manager
9. Nichole Stenbak comments regarding Spring Street Park	#10000b	Referred to General Manager

10. Rigo Beas comments regarding Spring Street Park	#10000c	Referred to General Manager
11. Mitiz Young comments regarding Spring Street Park	#10000d	Referred to General Manager
12. Timothy Lee comments regarding Spring Street Park	#10000e	Referred to General Manager
13. Ron Bitzer comments regarding Land Development Policies for Public Parks	#10001	Referred to General Manager
14. Lisa Baca comments regarding PlayLA	#10002	Referred to General Manager
15. Anonymous comments regarding Synthetic Turf Policy	#10003	Referred to General Manager
16. Tiffany Risucci comments regarding an Interaction at Encino Rec Center	#10004	Referred to General Manager
17. Gerry Hans comments regarding the Alcohol Policy in Griffith Park	#10005	Referred to General Manager
18. Donna Vaccarino comments regarding Pacific Palisades Park Plan	#10006	Referred to General Manager
19. Ivette Davilla comments regarding the Chevy Chase Volleyball League Selections	#10007	Referred to General Manager



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

---

**Re: Palisadians In Support of the New Rec Center Turf Fields**

1 message

**Rap Commissioners** <rap.commissioners@lacity.org>

Thu, Nov 6, 2025 at 7:56 AM

To:

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners

On Tue, Nov 4, 2025 at 3:28 PM David Haynie

wrote:

Commissioners of the Rec and Parks,

Councilwoman Traci Park, Commissioner Renata Simril, Commissioner Luis Sanchez, Commissioner Marie Lloyd, Commissioner Tafari Bayne, Commissioner Benny Tran,

I am writing to ask for your support in approving the proposed new turf sports complex. These fields represent a once-in-a-generation opportunity to shape the future of our community by providing our children and families with the safe, reliable space we desperately need. This project is not just about sports; it is about investing in the future of the Palisades.

Our community is facing a severe shortage of space that can accommodate our community's needs. For too long, we have had to watch our children compete for scarce practice times, face cancelled games due to weather, or travel long distances simply to play. Our kids deserve to play at home, on fields that reflect the pride and strength of our community.

The new complex will directly address our current challenges. Unlike natural grass, they will allow for consistent play in nearly all weather conditions, dramatically reducing downtime and cancellations. The new design maximizes every square foot, allowing for the simultaneous hosting of multiple teams, sports, and activities. This efficiency ensures that more Palisadians can participate in the programs that keep our children active and connected.

These fields are also both a safer and more sustainable choice than grass. This generation of turf technology has proven to be as safe as well maintained grass fields and safer than overused grass facilities. The completely recyclable turf is also PFAS-free, designed with cooling technology, and requires no constant watering, mowing, reseeding, or fertilizing. This complex will reduce costs year after year and save our community millions of gallons of precious water. Those savings will be reinvested where they belong -- back into programs for our kids.

Beyond youth sports, this complex will become a proper gathering place for the entire community. From school events to fitness programs to local celebrations, it will be a space where

neighbors connect and the spirit of the Palisades shines. Neighboring towns with similar facilities are already thriving; we should expect no less for our own families.

This project will:

Provide a safe and reliable space for our children to play, grow, and thrive.

Expand opportunities for all sports, activities, and community events.

Conserve water and reduce costs for our community.

Strengthen the Palisades by giving families a place to gather and connect.

I believe these fields offer an opportunity to leave a lasting legacy, ensuring that our children, and their children after them, have the home fields they deserve. I respectfully ask that you utilize your positions of leadership to help bring this vision to reality.

With gratitude and hope,

David Haynie

Pacific Palisades, California 90272

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640  
Fax: (213) 202-2610  
Mail Stop: 625/15  
Website: [www.laparks.org](http://www.laparks.org)





Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

## Re: Urgent Request for Review of Regulatory Violations at Orcutt Ranch

1 message

Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

Fri, Oct 31, 2025 at 3:41 PM

To: Malihe Shamayeli

Good afternoon,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners and staff.

On Fri, Oct 31, 2025 at 3:24 PM Malihe Shamayeli

wrote:

Dear City Officials,

I am writing to follow up on our letter dated October 26, sent on behalf of the Orcutt Ranch Preservation Society, regarding serious and ongoing violations at Orcutt Ranch. As of today, we have not received any acknowledgement or response.

Given the gravity of the issues outlined—including CEQA noncompliance, misuse of historic designation, and restricted public access—we respectfully request confirmation of receipt and a written response by November 5th, 2025. We are seeking clarity on whether the City intends to investigate these matters and implement corrective actions.

Our community remains committed to constructive engagement. However, continued inaction will compel us to pursue legal remedies to ensure compliance and protect this historic public resource.

We appreciate your prompt attention and look forward to your reply.

Sincerely,

Malihe Shamayeli

Community Liaison

Orcutt Ranch Preservation Society

On Sun, Oct 26, 2025 at 1:17 PM Malihe Shamayeli

wrote:

Hello,

I am writing on behalf of the Orcutt Ranch Preservation Society, a neighborhood association dedicated to safeguarding the historical, environmental, and civic integrity of Orcutt Ranch and its surrounding community.

We are documenting a series of ongoing violations at Orcutt Ranch that raise serious concerns under the California Environmental Quality Act (CEQA) and multiple provisions of the Los Angeles Municipal Code. These include:

- **CEQA Noncompliance:** Failure to assess cumulative impacts, inadequate mitigation measures, and procedural deficiencies in environmental review.

- **Misuse of Historic Park Designation:** The Department is actively promoting Orcutt Ranch—designated as a Historic-Cultural Monument for public recreational use—as a private event venue, contrary to its intended purpose.
- **Noise Ordinance Violations:** Recurring amplified music inconsistent with permitted public and open space land use, in violation of the Los Angeles Noise Ordinance.
- **Restricted Public Access:** Frequent and ongoing limitations on public access to areas such as parking, restrooms, and the historic adobe, for commercial gain—undermining its designation as a public park.
- **Degradation of Historic Resources:** Accelerated wear and deterioration of the historic adobe structure due to intensive use for private events and rentals.
- **Breach of Public Trust:** Exclusion of community stakeholders from decision-making processes and disregard for protections afforded to historical resources.

These issues are not isolated incidents. They reflect a troubling pattern of misuse and regulatory noncompliance that threatens the integrity of a designated Historic-Cultural Monument and erodes public confidence in the City's stewardship.

We respectfully request that the City:

1. Suspend all commercial activity at Orcutt Ranch pending a lawful review.
2. Initiate a formal investigation into CEQA and municipal code violations.
3. Provide a written response outlining corrective actions and a timeline for implementation.

We remain committed to constructive engagement. However, absent meaningful action, we are prepared to pursue all available legal remedies.

Please confirm receipt of this letter and advise whether the City intends to address these concerns.

Sincerely,

**Malihe Shamayeli**

Community Liaison

Orcutt Ranch Preservation Society

--  
City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640  
Fax: (213) 202-2610  
Mail Stop: 625/15  
Website: [www.laparks.org](http://www.laparks.org)



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

---

**Re: Griffith Park Advisory Board - Board of Commissioners Agendizing the Griffith Park Pony Rides to Outline Next Steps**

1 message

---

**Rap Commissioners** <rap.commissioners@lacity.org>

Thu, Nov 6, 2025 at 7:55 AM

To: Alex Crow

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioner

On Mon, Nov 3, 2025 at 8:43 AM Alex Crow

wrote:

Good morning, RAP Commissioners. Please find the Griffith Park Advisory Board's letter regarding the Pony Rides attached. Thank you.

--

Alex Crow

Chair, Griffith Park Advisory Board

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640  
Fax: (213) 202-2610  
Mail Stop: 625/15  
Website: [www.laparks.org](http://www.laparks.org)



## **Griffith Park Advisory Board**

*Community Stewards of LA's Largest Park & Great Urban Wilderness*

Department of Recreation and Parks, City of Los Angeles

[www.laparks.org/griffithpark/advisory](http://www.laparks.org/griffithpark/advisory)

October 28th, 2025

Los Angeles Board of Recreation and Parks Commissioners

RE: Board of Commissioners Agendizing the Griffith Park Pony Rides to Outline Next Steps

Synopsis: Griffith Park Advisory Board respectfully requests that the status of the Griffith Park Pony Rides be placed on the agenda for an upcoming meeting of the Department of Recreation and Parks Commissioners before year end.

Dear Commissioners:

The multi-year saga of the Pony Rides is one that the Griffith Park Advisory Board is intimately familiar with and we implore you to agendize this item so that we can close this chapter. Our board strives to represent as many park stakeholders as possible and is blessed to frequently have members of the equestrian community serving on our board. When concerns about the prior operator were first raised in 2022—culminating in the closure of the rides as they had existed—our board quickly formed an ad hoc to both investigate and monitor the issues and this facility as a whole.

The overwhelming conclusion by our ad hoc in early 2023, after months of extensive community outreach, was that the Pony Rides should return to their historic location within Griffith Park as soon as possible. Similarly, other respected community organizations came to the same conclusions and were quite vocal in their feedback. We fully appreciate that the Department of Recreation and Parks needed to conduct their own outreach and due diligence, which was effectively handled by Placeworks from mid-2023 to early 2024.

These findings were presented to the Board of Recreation and Parks Commissioners in September 2024, with the recommendation that the Pony Rides return to Griffith Park.

Since late last year we have been eagerly awaiting any sort of update. With extensive community engagement completed through the “Reimagining the Pony Ride Site” process and broad interest in reactivating this historic attraction, we believe the public is owed an update from the Board regarding next steps. Griffith Park Advisory Board respectfully requests

*BOARD MEMBERS: Chair – Alex Crow; Vice Chair – Alex Phillips; Secretary – Jane Carlson; Aaron Chung; Jason Greenwald; Billy Griffin; Amy Gustincic; T. Hagans; Cristian Hamilton; Chris Laib; Sarah Lann*

that the status of the Griffith Park Pony Rides be placed on the agenda for an upcoming meeting of the Department of Recreation and Parks Commissioners before year end.

Upcoming Commission meetings are scheduled for November 20 (Balboa Sports Complex), December 4 (Valley Plaza Recreation Center), and December 18 (Friendship Auditorium). While any of these dates would provide a valuable opportunity for discussion, the December 18th meeting at Friendship Auditorium - given its central location - may offer the best opportunity for greater stakeholder participation. We appreciate the Commission's continued attention to this cherished Griffith Park site and look forward to renewed dialogue on its future.

Many thanks,

Alex Crow  
Chair, Griffith Park Advisory Board

A handwritten signature in black ink, appearing to read 'Alex Crow', with a stylized flourish at the end.

cc: RAP: Jimmy Kim, Matthew Rudnick, Brenda Aguirre, Stefanie Smith, Tracy James; CD4: Mehmet Berker, Hannah Jaeger



Rap Commissioners <rap.commissioners@lacity.org>

---

## Re: Griffith Park Advisory Board - Letter Regarding Digital Signage

1 message

---

**Rap Commissioners** <rap.commissioners@lacity.org>

Fri, Nov 7, 2025 at 7:48 AM

To: Alex Crow

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners.

On Fri, Nov 7, 2025 at 6:38 AM Alex Crow

wrote:

Good morning, RAP Commissioners. Please find the Griffith Park Advisory Board's letter regarding Council File 25-1034 and potential signage in the park attached.

Thank you for your time.

--

Alex Crow

Chair, Griffith Park Advisory Board

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640  
Fax: (213) 202-2610  
Mail Stop: 625/15  
Website: [www.laparks.org](http://www.laparks.org)



## **Griffith Park Advisory Board**

*Community Stewards of LA's Largest Park & Great Urban Wilderness*

Department of Recreation and Parks, City of Los Angeles

[www.laparks.org/griffithpark/advisory](http://www.laparks.org/griffithpark/advisory)

October 28th, 2025

Los Angeles Board of Recreation and Parks Commissioners

RE: Council File 25-1034 and Concerns about Potential for Signage in Griffith Park

Synopsis: Griffith Park Advisory Board is unanimously opposed to any advertising signage, let alone digital signage, in Griffith Park

Dear Commissioners:

When many Angelenos think about Griffith Park, what immediately comes to mind is an oasis amidst the urban sprawl of our great city. This Urban Wilderness Identity is one of the many things that makes this park so special to so many. As the Griffith Park Advisory Board, we feel that this intrinsic character of the park is incredibly important and worth protecting. We frequently look to guidepost documents, like the Vision for Griffith Park, as well as historical context to best examine any potential new and future impacts or changes to the park.

With this in mind, we are somewhat concerned to hear about the recent discussion around Council File 25-1034 and the consideration of digital signage at Department of Recreation and Parks facilities. Our board is incredibly sympathetic to the severe funding shortage that RAP is faced with and applaud efforts to creatively consider revenue sources; we are also interested in being a part of the solution to address this deficit and find new ways of generating income for the park, whether it be by conventional or unconventional methods. That said, we would stress that there is not a one-size fits all approach that can be prescribed to all of the parks in the system.

Griffith Park's Urban Wilderness Identity and status as a Historic Cultural Monument make it clear that any discussion of digital signage, or any kind of mass advertising, would inappropriate and incongruous with the fundamental tenets of the park. This is articulated numerous times throughout the Vision for Griffith Park - perhaps most notably on page 44.

*BOARD MEMBERS: Chair – Alex Crow; Vice Chair – Alex Phillips; Secretary – Jane Carlson; Aaron Chung; Jason Greenwald; Billy Griffin; Amy Gustincic; T. Hagans; Cristian Hamilton; Chris Laib; Sarah Lann*

*"The existing facilities should be managed and maintained in such a manner as to enhance the Park's Urban Wilderness Identity and all improvements, changes, additions, or other structural changes, including signage, to any of the recreational facilities or venues, should be subject to the design elements of this Vision document. Due to the designation of Griffith Park as a Historic Cultural Monument, most alterations to existing structures will require review by the City's Office of Historic Resources."*

Sadly, this is not the first time this issue has been raised, with prior attempts in both 2011 and 2017 to utilize this method of monetizing the park. Just as those ill-conceived efforts were handily struck down, so must any new conversation or consideration of novel signage within Griffith.

The Griffith Park Advisory Board is unanimously opposed to any advertising signage, let alone digital signage, in Griffith Park. It violates the precepts of the city-adopted Vision for Griffith Park, interferes with the wildlife residing in America's largest urban wilderness park, and would be a detriment to all the Angelenos who cherish this amazing park.

Many thanks,

A handwritten signature in black ink, appearing to read 'Alex Crow', with a long horizontal flourish extending to the right.

Alex Crow  
Chair, Griffith Park Advisory Board

cc: RAP: Jimmy Kim, Matthew Rudnick, Brenda Aguirre, Stefanie Smith, Tracy James; CD4: Mehmet Berker, Hannah Jaeger





Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

---

**Re: GPAB -- Park-Closure Policy Letter**

1 message

**Rap Commissioners** <rap.commissioners@lacity.org>

Thu, Nov 13, 2025 at 7:40 AM

To: Alex Crow

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners

On Mon, Nov 10, 2025 at 2:26 PM Alex Crow

wrote:

Good afternoon, commissioners. Please find the Griffith Park Advisory Board's letter regarding park-closure policy along with our Fire Safety Ad Hoc report (authored last February) attached. Thank you for your time.

--

Alex Crow

Chair, Griffith Park Advisory Board

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640

Fax: (213) 202-2610

Mail Stop: 625/15

Website: [www.laparks.org](http://www.laparks.org)

## **GPAB Fire Safety Ad Hoc Committee Report**

### **February 24, 2025**

In response to the January 2025 wildfires and the continued fire risk in Griffith Park, we recognize the urgent need to strengthen fire prevention, emergency preparedness, and response efforts. It is essential that these measures prioritize safety while also considering the needs of the diverse Griffith Park stakeholders and ensuring proper funding for any new initiatives.

To protect public safety, park resources, and surrounding communities, we recommend the following measures:

#### **1. Fire Prevention as a Priority**

- No smoking in the park.
  - i. Re-evaluation of legal smoking areas within Griffith Park.
    - 1. Certain venues (e.g., Greek Theatre, golf courses, film shoots) currently allow smoking in designated areas. These policies should be re-considered with input from Park Rangers and LAFD.
  - ii. Expanded public-awareness campaigns to educate visitors on the no-smoking policy and its role in fire prevention.
    - 1. Given the potential for smoking incidents to lead to brush fires in the park, this step could significantly decrease fire risk. Options include Park Ambassadors, social media campaigns, messaging from specific venues (e.g., Observatory).
    - 2. Park visitors should be educated (via further public awareness) to contact Park Rangers anytime smoking is observed or in the event of any fire.
  - iii. Installation of additional signage reinforcing the no-smoking rule.
    - 1. It is important that signage reflect the current \$1,000 fine.
    - 2. Electronic message boards at primary entry points and large gathering spots can be used for this purpose.
  - iv. Strict enforcement of regulations prohibiting smoking.
    - 1. Park Rangers must be empowered to write citations for every smoking offense in the park. If public awareness/signage is enhanced, there will be no reason for offenders to claim ignorance.
    - 2. The City Attorney should be asked to re-evaluate policies regarding smoking offenses (i.e., whether to pursue fines, etc.)
- No camping in the park
  - i. Strict enforcement of regulations prohibiting camping.
    - 1. Identify and provide any necessary tools for Park Rangers to enforce this ban.
    - 2. Park entrances must be closed at their designated times. This responsibility falls to LAPD Security Services and has been inconsistently managed.
      - a. Some gates (e.g., Canyon Drive) are mandated to close at sunset yet are frequently open many hours later.

- b. Despite a park-wide closure time of 10:30 pm, visitors are often observed in certain locations (e.g., Old Zoo) into the early-morning hours.
  - c. Determine and equip LAPD with the necessary resources to enforce park/gate closure times.
  - d. Evaluate and implement additional outreach efforts for unhoused individuals camping in the park in coordination with CD4.
- Regular and thorough brush clearance to reduce fire hazards.
  - i. RAP currently conducts thorough brush clearance in full compliance with LAFD guidelines. Solicit LAFD's recommendations for any policy updates based on lessons learned from recent wildfires.
  - ii. Exploration of controlled burns as a clearance method. While such a practice would be controversial and would require serious risk assessment, it is worth hearing from experts (including RAP's Urban Ecologist) as to whether it should be evaluated.
  - iii. Engage RAP Urban Ecologist to develop strategies for invasive plant removal and fire-resistant native plantings, as appropriate.
  - iv. Establish clear communication channels with surrounding neighborhoods about brush clearance protocols.
- Evaluate LADWP infrastructure
  - i. Given the role that power lines and other electrical equipment have played in wildfires elsewhere, seek LADWP assessment of, and upgrades to, high-risk electrical infrastructure in and around Griffith Park.
  - ii. While the water infrastructure in the park is impressive (and enhancements are already in the works), LADWP and LAFD should ensure that the wilderness areas in the western part of the park are sufficiently served.

## **2. Emergency Preparedness and Response**

- Educate the public about Red Flag Warnings/Red Flag Alerts
  - i. A Red Flag Warning (National Weather Service) means critical fire-weather conditions are either occurring now or will occur shortly.
  - ii. A Red Flag Alert (LAFD) means weather conditions are such that the potential for a fast-moving brush fire is extremely high.
  - iii. Even though they occur with some regularity, Red Flag Warnings/Alerts still represent the potential for real danger and should not be taken lightly.
  - iv. Public awareness campaigns (see below) are essential on Red Flag days.
- Review and strengthen evacuation plans, with a focus on large/high-risk venues.
  - i. Large gathering points such as the Observatory, Greek Theatre, Zoo, Autry, etc., should take a fresh look at their plans.
  - ii. Lake Hollywood Park and other major gathering points in the Western portion of the park should be considered.
  - iii. High-risk venues such as the Zoo Magnet, Equestrian Center and any other areas of the park visited by large numbers of children and families (including Boys Camp and Girls Camp) should also receive high priority.

1. RAP/Los Angeles Equestrian Center and Animal Services initiate and activate a shared understanding of stakeholder responsibilities and allocate the human resources to meet the moment efficiently.
  2. Develop a community outreach information portal in partnership with RAP, Los Angeles Equestrian Center, and Animal Services to coordinate large-animal evacuation, on-site donations, and volunteer efforts.
- Implement an early-warning response system on Red Flag days, including increased staffing and public outreach. Dedicated funding is critical.
    - i. It is essential to enact policies that ensure visitors and residents feel confident that fire risks are being responsibly managed.
    - ii. Park Ambassadors/part-time staff can serve as “eyes and ears” for such issues as smoking, and should be deployed on all Red Flag days.
    - iii. Additional public outreach measures — to be determined by RAP in coordination with Park Rangers, LAFD, etc. — should be enacted.
  - Consider additional enforcement actions or fines on Red Flag days to deter fire risks.
    - i. Evaluate the feasibility of increasing smoking fines on Red Flag days to enhance deterrence and provide law enforcement with additional tools.
    - ii. Identify and implement further enforcement tools recommended by LAFD, Park Rangers, or LAPD.

### **3. Park-Closure Protocols**

- Park closures should be a last resort but may be necessary during episodes of the greatest fire risk, such as in January 2025.
- Specific criteria for closures should be established in advance, while decision-makers retain emergency authority to close the park at any time.
  - i. RAP should work with LAFD to determine specific criteria and triggers for closure, with input from Park Rangers and LAPD.
  - ii. Criteria should be communicated to the public so that park closures are never a surprise.
  - iii. Negative impacts on stakeholders
    1. In weighing standards for park closure, it is important to recognize both the value of park access to visitors, as well as the financial implications for City departments, employees and concessionaires.
  - iv. Positive impacts on first responders
    1. As a counter-balance, it is recognized that park closure reduces impediments to emergency access, visitor-associated fire risks and reduces the number of individuals who may need to be evacuated.
  - v. We look forward to reviewing proposed standards for closure as part of this process.
- Any closure must be supported by increased staffing and public outreach to ensure effectiveness.
  - i. Public information must be coordinated by RAP, CD4 and other City of LA agencies, and shared with key stakeholder groups (e.g., park venues, Friends of Griffith Park, local HOAs, resident associations and neighborhood councils).

- ii. Increased staffing any time the park is closed is an absolute necessity. Closing the park without sufficient staffing invites scofflaw entry and illicit behavior at precisely the time it is most dangerous.
- Provide economic support for concessionaires and staff.
  - i. Relief pay and benefits should be provided for park employees and staff impacted by closures due to fire risk.
  - ii. Financial assistance or temporary relief measures should be considered for concessionaires facing financial loss from closures.
  - iii. A dedicated fund should be established to mitigate economic hardships resulting from necessary fire-prevention measures.

#### **4. Funding Commitment**

- Sustainable funding must be allocated for fire prevention, emergency preparedness, and response efforts.
- Given the ongoing risk of large-scale fire events and the resulting public-safety threat, such funding should not be viewed as a luxury, but rather as a necessity.

The above recommendations are informed by discussion with experts including LAFD, Park Rangers, LADWP and RAP staff. We believe these recommendations are sensible, balanced and entirely doable. We look forward to responses from key agencies — RAP, LAFD, LAPD, etc. — and will continue to participate in the policy-making process. Thank you for this opportunity to express our views on fire safety as community stewards of Griffith Park.

###



## **Griffith Park Advisory Board**

*Community Stewards of LA's Largest Park & Great Urban Wilderness*

Department of Recreation and Parks, City of Los Angeles

[www.laparks.org/griffithpark/advisory](http://www.laparks.org/griffithpark/advisory)

November 10th, 2025

Los Angeles Board of Recreation and Parks Commissioners

RE: Park-Closure Policy in Griffith Park

Dear Commissioners,

With high-fire season upon us, our board is pleased to learn that RAP executives are working on a park-closure policy that would apply to extreme wildfire events. One of the lessons learned from the January wildfires is the importance of creating clear and thoughtful guidelines, and communicating those guidelines to the public. This need is especially relevant for large urban wilderness areas such as Griffith Park.

As the RAP team works on this policy, we would like to draw your attention to the attached report, which our board prepared in February. Among other things, it contains our initial thoughts on the principles and guidelines that might guide a park-closure policy. We look forward to working with RAP staffers as part of this effort.

Sincerely,

Alex Crow

Chair, Griffith Park Advisory Board

cc: RAP: Jimmy Kim, Matthew Rudnick, Brenda Aguirre, Stefanie Smith, Tracy James

CD4: Daedre Levine, Mehmet Berker, Hannah Jaeger



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

---

**Re: GPAB Travel Town Letter**

1 message

**Rap Commissioners** <rap.commissioners@lacity.org>

Fri, Nov 14, 2025 at 9:06 AM

To: Alex Crow

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners

On Fri, Nov 14, 2025 at 7:52 AM Alex Crow

wrote:

Good morning, commissioners. Please find GPAB's letter regarding Travel Town parking attached. Thank you.

--

Alex Crow

Chair, Griffith Park Advisory Board

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640  
Fax: (213) 202-2610  
Mail Stop: 625/15  
Website: [www.laparks.org](http://www.laparks.org)



## **Griffith Park Advisory Board**

*Community Stewards of LA's Largest Park & Great Urban Wilderness*

Department of Recreation and Parks, City of Los Angeles

[www.laparks.org/griffithpark/advisory](http://www.laparks.org/griffithpark/advisory)

October 28th, 2025

Los Angeles Board of Recreation and Parks Commissioners

Re: Paid Parking at Travel Town Museum

Dear Commissioners:

The Travel Town Museum in Griffith Park is free for all park visitors to enjoy, but does charge for services such as rentals, concessions and other specialized services within the museum. However, as we the Griffith Park Advisory Board understand, there are increased deferred maintenance costs and various desired improvements that cannot be addressed without finding additional means of increasing revenue or obtaining major donations from the public.

The proposal presented to the board outlines that the parking lot directly adjacent to the museum be a paid lot during museum operating hours and is to remain free to park visitors until 10am. The benefits for future museum visitors would include capital improvements like bathroom updates, children's playground, a remodel of the exhibit hall and other improvements for all museum guests.

With all the above information guiding our decision, the Griffith Park Advisory Board is in support of the proposal for paid parking at Travel Town Museum. That said, we would be remiss not to mention that our support for this measure came after a split decision among our board.

Sincerely,

Alex Crow

Chair, Griffith Park Advisory Board

cc: RAP: Jimmy Kim, Matthew Rudnick, Brenda Aguirre, Stefanie Smith, Tracy James; CD4: Mehmet Berker, Hannah Jaeger

*BOARD MEMBERS: Chair – Alex Crow; Vice Chair – Alex Phillips; Secretary – Jane Carlson; Aaron Chung; Jason Greenwald; Billy Griffin; Amy Gustincic; T. Hagans; Cristian Hamilton; Chris Laib; Sarah Lann*





Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

## Re: Spring Street Park Fire Set

1 message

**Rap Commissioners** <rap.commissioners@lacity.org>

Thu, Nov 6, 2025 at 8:00 AM

To: Arlene Johns

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners.

You may also visit the MyLA311 website to create a service request at: <https://myla311.lacity.gov/s/>

On Wed, Nov 5, 2025 at 12:48 PM Arlene Johns

wrote:

Good Day,

I am a resident of El Dorado Building for past 15 years.  
As you may know currently the park is not being closed and locked in the evening and many are staying in all hours.

Early this morning when I walked my dog in Harlem Alley I noticed a very strong smell of smoke and to summarize - someone had started a small fire behind the playground area of the park. It extinguished itself while the security guard of our building and I watched, luckily.

I do not need to elaborate on what a problem this is do I?

We need the city to close this park at night.

Thank you for your time-

Arlene Johns

Sent from my iPhone

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640  
Fax: (213) 202-2610  
Mail Stop: 625/15  
Website: [www.laparks.org](http://www.laparks.org)



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

## Re: Spring Street Park (and Spring Street) is going down

1 message

Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

Thu, Nov 13, 2025 at 7:51 AM

To: Klaus Havelund

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners.

You may also visit the MyLA311 website to create a service request at: <https://myla311.lacity.gov/s/>

On Tue, Nov 11, 2025 at 6:38 AM Klaus Havelund

wrote:

Wrt. Spring Street Park,

I am writing concerning **Spring Street Park**. It is currently **not being closed at night** after the El Dorado HOA board took the decision to no longer ask its security (CHASE) to close the gates, which includes first moving people out of the park. This was done due to hostile episodes where homeless and drug users refused to leave the park.

We really need to see the park closed at night. At this point homeless people hang out in the park at night. There is a constant glow of crack pipes in the darkness. There was a fire in the park the other day. I observed a what I believe was a drug dealer in early morning parking in a high end car outside the park, walking into the park, and coming out 5 minutes later, and leaving (I have a photo of the car, including number plate, but I did not see any drug dealing, one can just guess what that was about).

It has to stop. The situation is overflowing to the surroundings, including the half circles outside the park, a man exposing himself to a homeowner in the Harlem alley next to the park. What before was occurring on 5th street has come to Spring between 4th and 5th, which before was a stronghold in the battle about downtown. It of course did not help that the Le Petit Paris restaurant closed, in part due to the rough neighborhood, and likely triggered by the shooting on October 6 where the bad guy was caught right in front of the El Dorado and the restaurant.

Volunteers have offered to close the park for the city, but I assume that involves insurance issues and all kinds of problems. My thought is that this is really something the city should do. But we are willing to do it if it is possible.

It is not just a park, it is a whole section of DTLA that is going down due to this park not being closed at night.

The other issue is **security in the park during the day**. Funds for this have already been approved, the money "just" need to be channeled into deployment of a security guard during day time. At this point when something happens in the park, there is no-one to call. The security guards from the surrounding buildings cannot go in. The BID cannot go in (for a reason I do not understand). The police only come if someone dies (and I love! the police, don't get me wrong, it just requires a very grave situation before they can afford to send a car). What does one do? Nothing at this point. We can just watch the neighborhood go down.



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

---

**Re: Spring Street Park**

1 message

**Rap Commissioners** <rap.commissioners@lacity.org>

Thu, Nov 13, 2025 at 7:52 AM

To: Nichole Stenbak

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners.

You may also visit the MyLA311 website to create a service request at: <https://myla311.lacity.gov/s/>

On Tue, Nov 11, 2025 at 1:48 PM Nichole Stenbak

wrote:

Hello,

I am a resident of the \_\_\_\_\_ I am writing to ask that you immediately address the current condition of Spring Street Park by closing the gates at 6pm.

We are currently being subject to open drug use, late-night fights, and noise disruptions, and public urination.

The park has rules that explicitly prohibit these activities as well as stated hours. However, the rules are not being enforced and the park is not being closed at night.

Please respond to this email at your earliest convenience. I can also be reached at

Thank you,  
Nichole Stenbak

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640  
Fax: (213) 202-2610  
Mail Stop: 625/15  
Website: [www.laparks.org](http://www.laparks.org)



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

---

**Re: Spring Street Park Issues**

1 message

**Rap Commissioners** <rap.commissioners@lacity.org>

Thu, Nov 13, 2025 at 7:52 AM

To: Rigo Beas

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners.

You may also visit the MyLA311 website to create a service request at: <https://myla311.lacity.gov/s/>

On Tue, Nov 11, 2025 at 4:42 PM Rigo Beas

wrote:

Hello,

I am a resident of the I am writing to ask that you immediately address the current condition of Spring Street Park by closing the gates at 6pm.

We are currently being subject to open drug use, late-night fights and noise disruptions, and public urination.

The park has rules that explicitly prohibit these activities as well as stated hours. However, the rules are not being enforced and the park is not being closed at night.

Please respond to this email at your earliest convenience.

Thanks,  
Rigo Beas

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640  
Fax: (213) 202-2610  
Mail Stop: 625/15  
Website: [www.laparks.org](http://www.laparks.org)



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

## Re: Concerns about Spring Street Park

1 message

**Rap Commissioners** <rap.commissioners@lacity.org>

Thu, Nov 13, 2025 at 7:53 AM

To: Mitzi Young

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners.

You may also visit the MyLA311 website to create a service request at: <https://myla311.lacity.gov/s/>

On Tue, Nov 11, 2025 at 10:22 PM Mitzi Young

wrote:

Hello,

I am a resident of the \_\_\_\_\_ I am writing to ask that you immediately address the current condition of Spring Street Park by closing the gates at 6pm.

Due to the park being open at all hours it is now open to drug use, late-night fights and noise disruptions, and public urination. The state of the park has been declining and a better use of resources would be to maintain the park by simply closing it to preventing misuse and degradation.

The park has rules that explicitly prohibit these activities as well as stated hours. However, the rules are not being enforced and the park is not being closed at night.

I would appreciate if you could respond to this email at your earliest convenience.

Thank you,

Mitzi

-----

She/her/hers

--  
 City of Los Angeles  
 Office of the Board of Recreation and Park Commissioners  
 Figueroa Plaza  
 221 North Figueroa Street, Suite 300  
 Los Angeles, CA 90012

Telephone: (213) 202-2640  
 Fax: (213) 202-2610  
 Mail Stop: 625/15  
 Website: [www.laparks.org](http://www.laparks.org)



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

---

**Re: Spring Street Park**

1 message

**Rap Commissioners** <rap.commissioners@lacity.org>

Thu, Nov 13, 2025 at 8:04 AM

To: Timothy Lee

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners.

You may also visit the MyLA311 website to create a service request at: <https://myla311.lacity.gov/s/>

On Wed, Nov 12, 2025 at 2:16 PM Timothy Lee

wrote:

To whom it may concern,

I'm a resident of  
Our building is right next to Spring Street Park.

With all due respect, can you guys PLEASE do something about this park's current condition?  
It was already a poorly managed park to start ... it's starting to turn into the next hot spot for junkies to defecate in the children's playground.

If the local government Parks/Rec department can't manage a tiny park like this... please sell the land to private ownership so it can be privately managed.

It's starting to get ridiculous.

Thanks  
Tim

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640  
Fax: (213) 202-2610  
Mail Stop: 625/15  
Website: [www.laparks.org](http://www.laparks.org)



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

---

**Re: Land Development Policies for Public Parks**

1 message

**Rap Commissioners** <rap.commissioners@lacity.org>

Thu, Nov 6, 2025 at 8:02 AM

To: Ron Bitzer

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners

On Wed, Nov 5, 2025 at 2:47 PM Ron Bitzer

wrote:

Sir or Madam, The Trust for Public Land -- not unknown to RAP in Los Angeles --- has published an interesting report on these issues. See attachment. Ron Bitzer, North Hollywood

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640  
Fax: (213) 202-2610  
Mail Stop: 625/15  
Website: [www.laparks.org](http://www.laparks.org)





# From Development Policy to Parks

Expanding Park Access Through  
Dedication Ordinances and Impact Fees



POLICY REPORT





# 10-Minute Walk

## PRIMARY AUTHORS

**Valerie Friedmann**, AICP, Associate Director of Policy and Public Affairs, 10-Minute Walk® program, Trust for Public Land

**Will Klein**, Director of Parks Research, Trust for Public Land

**Sam Savin**, Associate Director, Technical Assistance and Park Equity Accelerator, 10-Minute Walk® program, Trust for Public Land

## 10-MINUTE WALK® POLICY REPORTS

Trust for Public Land's Parks Initiative aims to ensure that everyone has access to a high-quality park close to home. To advance this mission, the 10-Minute Walk® program collaborates with local leaders to implement policies that expand access to quality parks—particularly in historically underinvested communities—to drive lasting, systemic change.

The 10-Minute Walk® Policy Reports series explores key issues that influence park access and equity. Each report provides data and insights that together create a research foundation for follow-on resources, including policy briefs, model ordinances, and implementation strategies. These resources help local leaders advance parks as essential infrastructure for public health, climate resilience, and social cohesion.

The findings, conclusions, and recommendations presented here, as well as any errors, are those of Trust for Public Land. This document is for informational purposes only and does not constitute legal advice.

Publication date: July 2025

**Suggested citation:** Friedmann, V., Klein, W., and Savin, S. *From Development Policy to Parks: Expanding Park Access Through Dedication Ordinances and Impact Fees*. San Francisco: Trust for Public Land, 2025. <https://10minutewalk.org/land-use-dedication-ordinances-impact-fees/>.

## ACKNOWLEDGMENTS

This report was created by Trust for Public Land's 10-Minute Walk® program to help local governments create parks and park systems that drive equitable, healthy, and thriving communities. It was written in collaboration with Trust for Public Land's Land and People Lab and other colleagues throughout the organization. It builds on insights shared through Trust for Public Land's 10-Minute Walk® Community of Practice, which in 2022–23 convened 65 parks and planning practitioners from 37 cities to discuss how land development affects city park systems. We thank the Community of Practice participants for their insights, contributions, and time shared throughout this yearlong training and peer learning program. A list of participating cities is included in [Appendix A](#).

We also recognize **Dr. John Crompton** for his formative work on parkland dedication ordinances, which is essential reading for interested policymakers and practitioners, and **Clancy Mullen**, AICP, one of the nation's foremost authorities on professional impact fee practice, whose research and publications have significantly advanced the field.

We thank the following experts who contributed directly to the development of this report.

**Jon Christensen**, Adjunct Assistant Professor in the Institute of the Environment and Sustainability, Luskin Center for Innovation, University of California, Los Angeles

**Peggy Chiu**, Senior Legal Counsel, Trust for Public Land

**Bianca Clarke**, Parks Initiative Lead and Associate Vice President, 10-Minute Walk® program, Trust for Public Land

**Natalie Donlin-Zappella**, Director, Partnerships & Climate Practice, Global Policy Leadership Academy (a LeSar Company)

**Lisa Foderaro**, Senior Writer and Researcher, Trust for Public Land

**Dr. Morgan Hughey**, Associate Professor, Department of Health and Human Performance; Faculty Fellow, Joseph P. Riley, Jr. Center for Livable Communities; College of Charleston

**Linda Hwang**, Senior Director, Strategy & Innovation, Land and People Lab, Trust for Public Land

**Christina Jang**, Associate Director, Learning & Communities of Practice, 10-Minute Walk® program, Trust for Public Land

**Matt Norris**, Senior Director, Urban Land Institute

**Victoria Oestreich**, Senior Manager, Urban Land Institute

**Dr. Alessandro Rigolon**, Associate Professor, Department of City & Metropolitan Planning, The University of Utah

**Daniel B. Rosenbaum**, Assistant Professor, College of Law, Michigan State University

**Dr. Sagar Shah**, AICP, Senior Manager, Knowledge and Career Programs, American Planning Association

**Tocarra Nicole Thomas**, AICP, Assistant Vice President of Housing and Development, Smart Growth America

**Meera Velu**, Parks and Conservation Planner, Trust for Public Land

**Jay Wozniak**, Director, Georgia Urban Parks Program, Trust for Public Land

Special acknowledgment is also due to the students from Professor Daniel Rosenbaum's spring 2024 Michigan State University Local Government Policy Lab. Their term projects significantly contributed to refining the legal foundations discussed herein.

JD Candidates May 2025: **Jill Apter**, **Brianna Tucci**, and **Torence Witherspoon**





© CHRISTOPHER T. MARTIN



# Table of Contents

- EXECUTIVE SUMMARY** ..... 4
- INTRODUCTION** ..... 6
  - Investigating Land Development Policies and Park Creation..... 8
  - Linking Land Development Policies and Park Equity..... 9
  - Report Structure..... 10
- SECTION 1: LAND DEVELOPMENT POLICIES AND PARKS**..... 11
  - How Do Land Development Policies Impact Park Systems?..... 11
  - Defining Park Dedication Ordinances and Impact Fees..... 13
  - Prevalence of PDOs and Impact Fees..... 13
  - Application and Strategic Use..... 14
  - Legal Authorization..... 15
  - Key Policy Components and Implementation Considerations..... 16
  - Main Challenges for Implementing Park Dedication Ordinances and Impact Fees..... 21
- SECTION 2: PLANNING FOR GROWTH**..... 22
  - How Can Cities Ensure That Park Creation Keeps Pace with New Development and Population Growth?..... 22
  - Three Reasons Park Creation Is Not Keeping Up with Population Growth..... 24
- SECTION 3: PLANNING FOR ACCESS**..... 29
  - How Can Cities Leverage Their Land Development Policies to Build Equitable Parks for All?..... 29
  - Two Opportunities to Increase Flexibility in Land Development Policies..... 30
- SECTION 4: PUBLIC-PRIVATE PARTNERSHIPS**..... 34
  - How Can Public-Private Partnerships Be Fostered to Provide and Manage Parks While Ensuring That Public Access Remains a Core City Value?..... 34
  - How the Prevalence of Alternative Management Entities Is Influencing Park Accessibility..... 35
- CONCLUSION AND CALL FOR FUTURE RESEARCH**..... 40
- FURTHER READING**..... 42
- APPENDICES** ..... 43
  - Appendix A: Full Methodology..... 44
  - Appendix B: Policy Review and Summary..... 48
  - Appendix C: Park Openings and Acquisitions Analysis..... 54
  - Appendix D: Park Acreage Per Resident Trend Analysis..... 58
- ENDNOTES** ..... 62

# Executive Summary

**P**arks provide essential health, environmental, economic, and societal benefits to communities across the country. Ensuring that all communities have equitable access to parks is vital. Yet, more than 100 million people in the United States—including 28 million children—do not have access to a high-quality park close to home. This disparity is further exacerbated by long-standing racialized policies and planning practices that have resulted in significantly less park space in neighborhoods of color and low-income neighborhoods compared with white or wealthier neighborhoods across the U.S.

Addressing these entrenched park inequities has become a primary goal for many park agencies across the country. At the same time, these agencies also face the ongoing challenge of keeping pace with urban growth and development. Growth necessitates a multifaceted approach to parks: it intensifies the need for enhanced parks in redeveloping urban centers and prompts the creation of new parks in rapidly expanding suburban areas. As park agencies are pressured to meet new residents' needs, the enduring consequences of disparities in park access become even more urgent, further underscoring the necessity of a comprehensive approach.

This dynamic raises an important question: If the policies and planning practices of the past century have resulted in such significant park inequities today, what should city leaders do to write a different story for the next hundred years? To tackle one aspect of this question, Trust for Public Land (TPL) convened experts and practitioners from across the country to explore how land development policy can be better constructed to create parks and green spaces that contribute to healthy, thriving communities for all.

This report focuses on two of the primary land development policies communities use to create new parks: park dedication ordinances and impact fees.

- A park dedication ordinance (PDO) is a city policy that requires a developer to provide land, funding, or both to meet the park needs created by a new development, typically within the property boundary of the contributing development.
- An impact fee is a one-time charge required from developers to offset the cost of city infrastructure, such as parks, that will need to be built to serve the new development.

The role of these two policies in park creation is substantial. A TPL analysis conducted for this report found that 67 percent of recent park and greenway openings across 10 representative U.S. cities were established on land provided by real estate developers as part of dedication requirements or funded by development fees. This trend underscores the urgent need to rethink how city agencies—including parks and recreation, economic development, planning, community services, and housing agencies—and the real estate and development community collaborate to ensure equitable access to nearby parks for all residents.

To better understand the limitations of these policies and practices, and to identify emerging trends among cities, TPL researchers interviewed municipal staff, convened discussion groups, analyzed recent park acquisition data, and reviewed local land development policies. From this process, three critical questions emerged about how land development policies can increase park access and address the park equity gap. These questions form the structure of this report:

## **How can cities ensure that park creation keeps pace with new development and population growth?**

Nationally, park creation is not keeping up with population growth. According to an analysis of TPL City Park Facts data, 65 of the 100 most populous U.S. cities had less park space per person in 2023 than in 2016. TPL analysis found three core challenges cities face with current land development policies that are limiting park creation:

- Park dedication ordinances and park impact fees are not always calibrated to reflect the true cost of land acquisition and park development.
- Cities do not always have financial or staffing capacity to build a park on vacant land transferred as part of a dedication requirement.
- Cities lack the data, staff, and systems to enable better coordination and understand how their development policies are—or are not—working.

## **How can cities leverage their land development policies to build equitable parks for all?**

Cities have traditionally adhered to a strict interpretation of “nexus” guidance, requiring the location of land dedication or fee usage to be on-site or in close proximity to the contributing development. This narrow interpretation ignores that residents are likely to utilize various types of parks across the citywide park system—and it can risk widening the park equity gap by concentrating park investment in areas where park needs may already be met. TPL analysis identified two common missed opportunities cities face in making sure their land development policies ensure access for all:

- Adopted nexus requirements do not always reflect citywide park utilization.
- A lack of flexibility in fee and dedication requirements can restrict a city’s ability to best address current gaps in park access.

## **How can private partnerships be fostered to provide and manage parks while ensuring public access remains a core city value?**

Parks and recreation agencies face challenges such as strained operating budgets and deferred maintenance backlogs, which can hinder their ability to take on new parks acquired through land development policies. To address these challenges, some cities are waiving dedication or fee requirements in exchange for private entities’ agreeing to build and manage new parks. This shift raises critical questions about ensuring public access. TPL analysis identified two key trends emerging among cities that are exploring alternative management approaches for public spaces:

- There are four common partnership entities, each with its own set of governance and financing implications: homeowners associations, special assessment districts, property managers, and business improvement districts.
- Cities are coalescing around a set of criteria to ensure privately managed space remains public, including the display of welcoming and visible signage, city advertising of the space as a public park, the requirement that the space meet the same operational standards as city-managed parks, and legal protection of the space to ensure it remains a publicly accessible park.

This report calls on city leaders to implement land development policies as essential tools for closing the park equity gap in their communities. It also serves as a starting point for TPL to continue researching and refining these policies, while building partnerships to better understand and address the complex dynamics of urban growth, real estate development, equitable park creation and access, and the evolving role of land development policy.

# Introduction



© JULIETA VERGINI

Parks and green spaces are helping confront some of today's most pressing societal challenges. They offer places to play,<sup>1</sup> exercise,<sup>2</sup> unplug,<sup>3</sup> and connect with others in our communities,<sup>4,5</sup> and they combat climate change.<sup>6</sup> While high-quality, close-to-home parks and green spaces offer benefits vital to community health, resilience, and sense of social cohesion, there is a significant disparity in who has access to available park space, and not all parks are created equitably.<sup>7,8,9</sup>

More than 100 million people in the United States—including 28 million children—do not have access to a high-quality park within a 10-minute walk of their home.<sup>10</sup> Even when a park is within walking distance, decades of racialized policies and planning practices have led to chronic disinvestment in parks serving neighborhoods with low income and neighborhoods with majority residents of color. Parks in neighborhoods with a majority of people of color are, on average, half the size of those in majority-white neighborhoods but serve nearly five times as many people. Similarly, parks in low-income neighborhoods are about four times smaller than those in wealthier neighborhoods.<sup>11</sup>

The complexity and magnitude of this issue necessitate comprehensive strategies, collaborations, and partnerships involving city parks and recreation agencies alongside various land use decision-makers. This point is especially pertinent because local park agencies are not always the primary actors in acquiring land for, or building, new parks today. New findings from Trust for Public Land (TPL) show that city planning and economic development agencies—which typically administer land development policies—and real estate developers are key drivers of land acquisition and park creation.

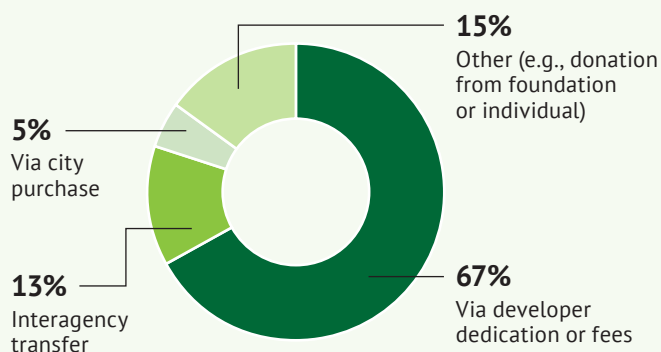
## Land Development Policy Is Driving Park Creation

TPL reviewed all park or greenway openings and land acquisitions over the past five years (2018–23) across 10 representative large U.S. cities with available data.<sup>a</sup> Collectively, the parks and recreation agencies in these 10 cities opened 76 parks or greenways between 2018 and 2023. Of these 76 sites, 67 percent were acquired via developer land dedication or purchased with development fees. Only 5 percent were acquired via city purchase (excluding purchases with development fees); 13 percent were acquired via interagency transfer, and 15 percent via other means, such as donations from foundations or individuals.

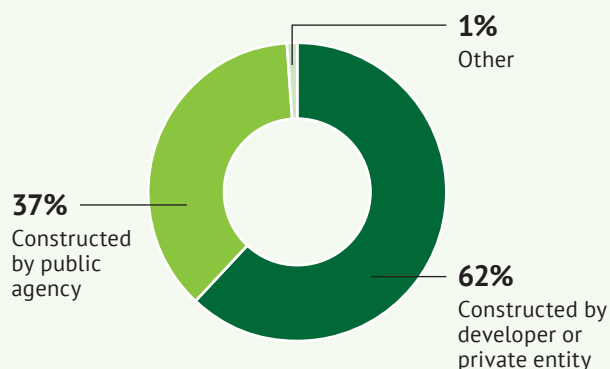
Park development paints a similar picture, which highlights the substantial role of developers: of the 76 park openings described above, 62 percent of the parks were constructed by the developer or a private entity prior to transfer to the city, while 37 percent were developed by the city’s parks and recreation or other public agency (with 1 percent developed by a different entity). See [Appendix C](#) for additional information.

### Analysis of all 76 park or greenway openings across 10 major U.S. cities, 2018–23

#### LAND ACQUISITION MECHANISM



#### PARK DEVELOPMENT MECHANISM



a The cities analyzed were Aurora, Colorado; Cleveland, Ohio; Columbus, Ohio; Denver, Colorado; Irvine, California; Lewisville, Texas; Lexington, Kentucky; Long Beach, California; Portland, Oregon; and Washington, DC.

Municipalities commonly employ two land development policies to facilitate the acquisition of land and development of parks in line with real estate development: park dedication ordinances (PDOs)<sup>i</sup> and impact fees. PDOs require developers to dedicate to a city a specified amount of land, fees, or both.

Impact fees require developers to pay a fee so that the city can acquire or build a park on land not controlled by the developer. The main goal of these two policies is to ensure that a community’s park system grows alongside its population and that the necessary park infrastructure is proportionally funded by development. These are two replicable, scalable policies currently utilized in many cities across the country to ensure development supports park goals.

i The term *parkland dedication ordinance* has historic roots in the early versions of these policies, which initially required land dedications only. Over time, many cities have continued using this terminology, even as the regulations evolved to include fees-in-lieu and land improvement fees. Given that these regulations now extend beyond land dedication alone, the authors advocate for the more comprehensive term *park dedication ordinance* (PDO). For clarity and consistency, we use *PDO* throughout this paper to refer to the policy mechanism at large.



Across the country, growing urban populations, rising land and construction costs, and strained government budgets have left many municipalities unable to fully fund the parks and recreational spaces that communities need. In this context, well-calibrated land development policies, including development mitigations such as land and fee dedications for parks, have become crucial tools to distribute the responsibility for creating and maintaining public parks as new development occurs. By thoughtfully balancing these policies, cities can ensure that new and redeveloping neighborhoods are equipped with adequate parks, preventing further disparities in park access and relieving pressure on existing facilities. To navigate these complexities, city leaders, parks and planning practitioners, and stakeholders need the knowledge, resources, and case-making information to develop local land policies that reflect this shared responsibility to meet community needs.

While this report focuses on PDOs and impact fees due to their significant influence on park creation, other development policies, such as open space zoning regulations, also play a key role in providing green space through the development process. These regulations and their relationship to PDOs and impact fees warrant deeper investigation in future research. It should also be noted that in some localities, evolving legislative environments are directly affecting development policy. A case in point: during the writing of this report, the Texas legislature passed a new law expressly limiting the ability of the state's largest cities to determine their own park dedication requirements for multifamily and commercial developments.<sup>12</sup> This underscores the urgent need for resources to help cities strategically apply PDOs and impact fees.

## Investigating Land Development Policies and Park Creation

To explore common patterns and emerging practices in land development policy and park creation, TPL conducted investigations along three parallel tracks, as listed below. TPL researchers supplemented these efforts with secondary research that helped illuminate the conversations and data collected through the three research tracks. The information gathered from all sources was synthesized to develop this report.

1. **Community of Practice:** TPL convened 65 parks and planning practitioners from 37 cities to discuss the role of land use policy, development policy, and partnerships with developers in shaping local park systems. Conversations took place during 2022–23, as part of a “Parks and Development Policy” track of the 10-Minute Walk® Community of Practice (CoP), a learning and peer networking program.
2. **Development policy review:** TPL reviewed the land development policies of 20 cities across the country to identify common patterns and emerging practices and to examine the relationship between these policies and the acquisition and development of parks and green space. As part of this review, TPL researchers conducted phone and email interviews with parks and planning staff to assess the strengths and limitations of these policies in their cities.
3. **Park openings and acquisitions analysis:** TPL analyzed recent park openings and acquisitions in 10 cities across the U.S. to determine the sources of funding for new land acquisition and park development. Data for this analysis was collected from city staff in each of the 10 cities. Additionally, TPL used its City Park Facts dataset to compare system-wide acreage trends over time across the 100 most populous cities.

The full methodology for each of the three research tracks, along with a list of participating cities, is provided in [Appendix A](#). [Appendix B](#) includes the policy review and summary. [Appendix C](#) contains the results of the park openings and acquisitions analysis, while [Appendix D](#) compares system-wide acreage trends using City Park Facts data. Together, these inputs offer a comprehensive perspective on the land development policies cities are currently using and highlight both the challenges and opportunities for refining these policies to further support equitable park creation.

# Linking Land Development Policies and Park Equity

The U.S. has a long history of unjust land development policies and practices that have contributed to enduring inequities in the built environment, including significant disparities in park access and quality for communities of color. A history of biased lending, exclusionary zoning, and racial covenants have created and reinforced segregated communities across the U.S.<sup>13</sup> These practices systematically denied African Americans and other racial and ethnic groups access to housing and public facilities in many neighborhoods, entrenching racial disparities in the built environment.<sup>14</sup> Although these policies were formally outlawed with the passage of the Fair Housing Act in 1968, which aimed to eliminate discrimination in housing based on race, color, religion, sex, or national origin, many cities and policymakers implemented new practices to maintain segregation.<sup>15</sup>

During the mid-20th century, efforts to desegregate public parks, pools, and other recreational spaces met significant resistance.<sup>16</sup> Many municipalities chose to close these facilities altogether rather than comply with desegregation mandates.<sup>17</sup> The U.S. Supreme Court upheld these closures in the 1971 *Palmer v. Thompson* decision, allowing cities to close public facilities rather than integrate them, provided the closures applied to all citizens equally. This context helps illustrate the enduring impact of unjust municipal policies and practices on marginalized communities and emphasizes the importance of acknowledging and addressing these historical inequities in contemporary policy discussions.<sup>18,19</sup>

Today, cities are actively working to rectify these exclusionary practices by reforming zoning and other land development policies.<sup>20</sup> As essential components of these policy reform efforts, PDOs and impact fees play a crucial role in building equitable communities where everyone has access to quality parks. Therefore, understanding the historical context in which these policies operate is key. PDOs and impact fees must be carefully designed to ensure they enhance park access equitably and avoid perpetuating past injustices or creating new unintended consequences. Cities must assess how communities of color and low-income residents will be impacted by new policies or changes in policy, as well as how entrenched government decision-making practices and lack of trust may obstruct the effective implementation of park equity goals.

This report explores the intersection of land development policies and park equity from a variety of angles. The intended purpose of PDOs and impact fees is to create parks in line with population growth and associated real estate development. Ensuring that these policies are successful in creating new parks in line with growth is essential to prevent the formation of new gaps in park access. [Section 2](#) of this paper discusses the importance of PDOs and impact fees to ensure the park equity gap does not widen as communities grow simply because the opportunity is missed to build and fund parks as real estate development occurs.

Next, by linking urban growth with park creation, PDOs and impact fees play a significant role in determining where new parks are located and which neighborhoods benefit from park investments. While these policies ensure that parks serve the immediate needs of the new populations they are designed to mitigate, the impact of these growing populations extends across the entire park system. For example, a new real estate development may trigger the requirement for a neighborhood park, but the residents of this development will also visit community and regional parks in other parts of the city to meet their broader recreational needs. [Section 3](#) of this paper examines how land development policies are being adjusted to account for citywide park utilization as a crucial strategy for advancing equitable park distribution and access.

Finally, as cities face financial pressures to maintain their current inventory of parks, they may look to partnerships with the private sector to provide and manage new parks. Understanding the equity implications of this model, as well as how to maintain full public access, is a core concern for cities and is addressed in [Section 4](#).

# Report Structure

The report is organized into four sections that address the need for information on these policies, as well as the questions, concerns, and challenges cities may encounter during their implementation.

1. **Land Development Policies and Parks:** This section provides an overview of park dedication ordinances and impact fees and outlines key policy components, legal aspects, and implementation considerations that shape their local application.
2. **Planning for Growth:** This section investigates several reasons park creation is not keeping up with population growth and offers insights from city policymakers who are refining their land development policies to ensure that park creation aligns with new real estate development.
3. **Planning for Access:** This section explores policy strategies that reflect the evolving relationship between urban growth and citywide park utilization and provides policy examples from cities that are achieving a more equitable distribution of park dedications and fees.
4. **Public-Private Partnerships:** This section examines how public-private partnerships can be structured to manage parks effectively while ensuring public access remains a core city value.

As city leaders work to reverse the trajectory of past policies and planning practices that have led to today's significant inequities, this report offers a set of considerations on PDOs and impact fees. It serves as a starting point, outlining current policies and their challenges and limitations, and posing key questions that need to be addressed to maximize the potential of land development policy in achieving multiple public policy goals. The report aims to provide a foundation for TPL and the broader parks and recreation field, supporting the development of additional resources, case studies, partnerships, and policy recommendations.

## SECTION 1

# Land Development Policies and Parks



© HOLLIS BENNETT

## How Do Land Development Policies Impact Park Systems?

**L**and development policies are regulations enacted by local governments to guide growth and protect public health, safety, and general welfare as real estate development occurs. These policies shape the built environment—the places where people live, work, play, and travel—by regulating where certain land uses such as housing and retail are located; influencing the size and shape of new buildings; and mandating the types of essential public infrastructure and facilities needed to support land uses, including roads, stormwater basins, and parks.

## Parks Are Essential Public Infrastructure

Parks are essential public infrastructure and are necessary to protect the health, safety, and welfare of communities across the country. Recent findings from TPL found that cities with the best park systems, based on the ParkScore® Index, are healthier places to live.<sup>21</sup> Parks are also critical for protecting residents from the dangers of climate change. Neighborhoods without parks are up to 6 degrees hotter than those adjacent to parks, and green infrastructure in parks helps filter millions of gallons of stormwater runoff in communities across the country.<sup>22</sup> Parks also contribute significantly to local economies, generating hundreds of billions of dollars in economic activity and supporting more than a million jobs nationwide.<sup>23</sup>

The American Society of Civil Engineers, in its 2021 Report Card for America's Infrastructure, gave the quality of the country's parks a grade of D+, reflecting the untapped potential of parks to fulfill these societal goals.<sup>24</sup> The poor grade also underscores the disinvestment and neglect that parks face. Parks, when properly invested in, provide many of the same services and benefits as "traditional" infrastructure such as roads and sewers.

The history of land development policies in the U.S. dates to the early 20th century with the introduction of planning tools such as zoning and land subdivision regulations.<sup>25</sup> These tools were designed to manage urban growth and isolate incompatible land uses—for example, keeping industrial factories away from residential neighborhoods. Zoning was also used deliberately as a legal mechanism to segregate communities by race and income, thus embedding deep social inequities into the urban landscape.<sup>26</sup> Before zoning became widespread, many cities were designed with walkable access to parks and green spaces, which were considered essential for public health. These spaces provided much-needed respite and recreational areas within densely populated neighborhoods but were often racially segregated.<sup>27</sup>

In the 1950s, suburbanization surged, driven largely by white flight as urban populations moved to sprawling tract developments that required new infrastructure. This movement was often motivated by a desire to avoid changing urban demographics and was supported by policies promoting residential segregation.<sup>28</sup> The question of who should bear the cost of the new infrastructure necessary for suburban growth catalyzed the use of various land development regulations, including park dedication ordinances and impact fees.<sup>29</sup> In the 1970s and 1980s, changing attitudes toward public facility financing, spurred by the tax revolt, inflation, and rising expectations for facility standards, forced local governments to explore all potential revenue sources.<sup>30</sup> Land development regulations such as park dedication ordinances and impact fees became more widely adopted in this context to ensure that new developments contributed their fair share to public infrastructure, including parks and recreational facilities.

Today, these policies operate in tandem with a variety of planning documents to guide urban growth. A community's comprehensive plan stands as the overarching planning document, articulating a community's primary goals and serving as a blueprint for their realization. Supporting this, parks and recreation system plans detail specific goals, policies, and strategies for park development. Land development policies, including park dedication ordinances and impact fees, are the regulations through which these long-range plans are implemented as real estate development progresses. This structured approach ensures that park development aligns with broader urban planning objectives while effectively meeting both present and future community needs.



# Defining Park Dedication Ordinances and Impact Fees

Park dedication ordinances and impact fees are specific types of land development policies designed to ensure that as real estate is developed, the necessary infrastructure and public facilities are provided in the appropriate amounts and locations to support a community's growing needs. These policies are commonly included in municipal zoning codes and subdivision regulations.

A **park dedication ordinance (PDO)** is a city policy that requires a developer to provide land, funding, or both to meet the park needs created by a new development, typically within the property boundary of the contributing development. In this context, *dedication* refers to the act of setting aside land specifically for park use as part of the development process, with the ownership of the land typically transferred to the city or local government. PDOs typically apply to residential development, although some cities are starting to implement them for nonresidential project types that generate demand for parks. PDOs may include requirements for land dedications to meet certain quality criteria, fees to construct parks on dedicated land, options for fees-in-lieu of land, and various forms of credits and exemptions.

An **impact fee** is a one-time charge required from developers to offset the cost of city infrastructure that will need to be built to serve the new development. Impact fees differ from PDOs in that they typically pay for the construction of off-site capital improvements that benefit the contributing development. Impact fees are not limited to parks; they were historically established, and are still used today, to fund various infrastructure projects such as roads and sewers. The specific name of these fees can vary by city and state, although they largely operate in the same manner. For example, some cities call them benefits assessments, connection charges, or system development charges. For the sake of clarity and consistency within this report, the term *impact fees* will be used throughout.

## Prevalence of PDOs and Impact Fees

For this report, TPL researchers conducted a development policy review of 20 major U.S. cities that either have one of these policies or are interested in adopting one. Of these 20 cities, 10 had PDOs, 5 had impact fees for parks, and the remaining 5, while not having formal policies, still engaged in negotiations with developers to provide parks or open space. The policy review revealed that many policy components are typical from city to city, and these are described in detail under “Policy Components” later in this section. The ways cities address these policy components and fulfill policy requirements, however, vary based on local contexts. (See [Appendix B](#).)

Other research indicates that the majority of large U.S. cities currently utilize a PDO, a park impact fee, or both. A 2020 review found that 57 percent of Texas municipalities (73 of 127) have a PDO. The same study also found that 62 percent of large U.S. cities outside of Texas (29 of 47 cities providing data) had either a PDO, a park impact fee, or both.<sup>31</sup> A forthcoming study by TPL and a university-based research team reviewed park policies in 25 cities across the U.S. in 2023 and found that more than half of the cities utilized a PDO, park impact fee, or both. Of the 25 cities, 4 cities had a PDO only, 6 cities had a park impact fee only, and 3 cities utilized both policies.

Specific to impact fees, 29 states have passed enabling legislation to define eligible facilities for which impact fees may be imposed; of those states, 83 percent (24 of 29) have authorized the use of local impact fees for parks.<sup>32</sup> A 2008 publication by the U.S. Department of Housing and Urban Development reports that impact fees are employed in nearly every U.S. state, including those without specific state legislation, as a common method to generate revenue for the wide variety of capital projects—not just parks—necessitated by new development.<sup>33</sup>

# Application and Strategic Use

PDOs and impact fees have a long history of use in the U.S. Their application has evolved from ad hoc negotiations to include developer requirements for land dedication, fees-in-lieu of land, and park development fees.<sup>34</sup> The first implementations of PDOs and impact fees were largely focused on residential subdivision development. As cities increasingly experience urban infill development—characterized by the construction of large mixed-use buildings in dense downtown cores—they are beginning to adapt their regulations to accommodate denser residential or commercial developments, with varying degrees of success.<sup>35</sup>

As the application of these policies has evolved, cities—and courts—have generally reached a consensus on the standard for new development: it should maintain current levels of park service as development progresses.<sup>36</sup> Therefore, PDOs and impact fees are designed to ensure that new development contributes its proportionate share toward maintaining existing levels of service. This contribution is determined through calculations and geographic considerations that are explored further under “Policy Components.”

Today, municipalities use PDOs and impact fees primarily for two purposes: acquiring land and developing park facilities. In terms of land acquisition, PDOs provide cities with several options. They can enable the city to accept land directly dedicated by developers, ensuring the land is located within the development site. Alternatively, cities can accept a fee-in-lieu of a land dedication, giving the city the flexibility to purchase land off-site, but typically nearby. Another approach allows the city to aggregate fees-in-lieu from multiple developments to purchase a larger site than any single developer would have dedicated. Unlike PDOs, impact fees typically do not provide a land dedication mechanism for acquisition; instead, they rely on the city to use collected fees to acquire off-site park space. Providing a “land dedication-in-lieu-of-fee,” however, is an emerging impact fee practice through which developers can provide land or a fully developed park rather than pay fees.<sup>37</sup>

In terms of park development, PDOs do not always require the inclusion of park facilities on the dedicated land. Often, the land obtained through PDOs is undeveloped, and the city must allocate additional funds for park construction. Some PDOs include a land improvement or park development fee that finances park construction on the dedicated land. In some instances, PDOs allow for a developer to dedicate a fully constructed park to the city or potentially to an alternative private entity such as a homeowners association (see [Section 4](#)). In contrast, cities typically use impact fees for both land acquisition and park development; the fees can be used to construct capital improvements on existing park sites that serve the new development and to acquire and develop new parks from the ground up.

PDOs and impact fees can create similar outcomes in park creation, but they are distinct in their practical application and legal foundations, both of which are discussed in the following sections. These distinctions can shape how a city strategically puts the policies to use. For example, PDOs are likely most effective at the project level. They ensure that park facilities are integrated into new developments during the planning phase to address the immediate needs of residents. This would tend to make PDOs useful in areas experiencing fast growth where local parks are insufficient or absent. On the other hand, impact fees are likely most advantageous for system-level improvements. They provide cities with a financial mechanism to support broad community planning goals and capital improvement programs, enhancing overall park system capacity that benefits both the contributing development and the wider area. Local governments may benefit from using a combination of both PDOs and impact fees. Together, these mechanisms can comprehensively ensure that new developments contribute their proportionate share to both local and community-wide infrastructure.

# Legal Authorization

As with other land development policies, the implementation of PDOs and impact fees involves the interplay of local, state, and federal government. Local governments must navigate state authorization, preemptions, and court precedents while ensuring compliance with federal case law and legal tests, as described in the subsections that follow.

**Local authority.** To implement a PDO or impact fee, a local government must first confirm its legal authority to impose the policy. Generally, cities with home rule power may implement either type of policy.<sup>38</sup> Home rule power grants local governments the authority to enact laws and regulations within their jurisdiction, as long as these actions align with state and federal law. This autonomy is underpinned by a local government's police power, which is the authority to enforce laws, such as land use policy, to protect the health, safety, and general welfare of the public. Local authority may be restricted at the state level through legislation (see below) and through preemption, as the introduction noted with the example of the state of Texas, whose legislature has limited its largest cities' ability to determine their own park dedication requirements for certain types of development.<sup>39</sup>

**State court precedent for park dedication.** At the state level, courts have consistently upheld PDOs as legitimate exercises of local police power.<sup>40</sup> A recent example comes from Minnesota, where the state Supreme Court confirmed the legality of PDOs in the 2023 *Puce v. City of Burnsville* case. In this ruling, the court found that the city's park dedication fee met the "essential nexus" and "rough proportionality" requirements, demonstrating that the fee was related to the impact of the proposed development. The court upheld the fee as a valid exercise of municipal authority, aligning with the broader goals of promoting public health, safety, and welfare. State legislatures may also restrict local discretion in specific PDO requirements, however, as was seen recently with the Texas legislature.

**State enabling laws and impact fee legislation.** In some states, impact fees are subject to state restrictions and procedural requirements, often referred to as "enabling legislation." Local governments first created impact fees without these state laws, justifying them under their home rule and police power authority to ensure public health, safety, and welfare.<sup>41</sup> Over time, some state courts have established additional guidelines for these fees.<sup>42</sup> Currently, 29 states have passed legislation specifically enabling, and providing guidance and restrictions on, the use of impact fees in general (not specific to parks).<sup>43</sup> Of the 29 states with impact fee legislation, 24 states explicitly allow local governments to enact impact fees for park creation.<sup>44</sup> While the lack of clear authorization for a type of facility generally amounts to a prohibition, this is not always the case. For the five states with enabling legislation that does not authorize parks, as well as the 21 states without enabling legislation, practitioners should refer to case law to determine local authority.<sup>45</sup> For example, while Illinois does not have clear statutory authority for impact fees beyond roads, park fees—as well as school and library fees—are authorized for home rule cities and counties based on the state constitution and court decisions.<sup>46</sup>

**Federal case law and legal tests.** The U.S. Supreme Court recognizes park dedication ordinances and impact fees as development mitigations. Development mitigations are requirements set by the government that a property developer must meet to gain approval for their project. The court uses a two-part legal test to assess mitigations. The first part, known as the "essential nexus" test, checks whether there is a direct link between the government's objectives and the mitigation (*Nollan v. California Coastal Commission*). If such a connection exists, the fees must be "roughly proportionate" to the impact that the proposed development is expected to have (*Dolan v. City of Tigard*). These tests ensure that the mitigations are justified and appropriate to the scale of the development. More details on these tests and the related policy components are provided in the following sections.



# Key Policy Components and Implementation Considerations

Through discussions with participants in the Community of Practice, TPL researchers identified key policy components and implementation considerations that influence the effectiveness of PDOs and impact fees (see Table 1.1). These insights were further explored through the development policy review of the various approaches cities take with each policy type. (See [Appendix B](#).)

The trends and insights identified across cities can help inform local planning efforts; however, it is important to acknowledge that there is no one-size-fits-all approach. Factors such as existing land use, market pressures, and competing priorities for land influence what strategies work best for cities. PDOs and impact fees also operate in concert with other planning and policy documents to comprehensively shape the location and accessibility of parks. Thus, they should be considered in the context of existing policies and overarching policy goals. The nuances and trade-offs associated with each policy approach are outlined in the following table and the narrative sections that follow.

**Table 1.1. Common Components of Park Dedication Ordinances and Park Impact Fees**

	Park Dedication Ordinances (PDOs)	Park Impact Fees
Overview		
Application	A PDO is a city policy that requires a developer to provide land, funding, or both to meet the park needs created by a new development, typically within the boundary of the contributing development.	An impact fee is a one-time charge required from developers to offset the cost of city infrastructure needed to serve the new development. Impact fees typically pay for the construction of off-site capital improvements that benefit the contributing development.
Legal authorization	Generally, cities with home rule power can enact PDOs legislatively through existing authorities; however, states can pass legislation to restrict this authority.	Generally, impact fees are adopted by cities under state enabling legislation or through the city’s home rule authority.
Policy Components		
Development type	PDOs are typically applied to residential development only, but some cities are exploring the potential for nonresidential PDOs.	Impact fees are typically applied to residential development but may also apply to nonresidential development.
Land dedication (i.e., land transfer)	Land dedication is the core component of a PDO; it does not necessarily require any associated land improvement or park development.	Typically not applicable, but some cities may allow or give credit for a land dedication-in-lieu of impact fee.
Land acquisition fee	Often provides an option for developers to pay a fee-in-lieu of dedicating land.	Impact fees can typically be used for both land acquisition and park construction.
Land improvement fee (park development fee)	In some cases, PDOs include funds for the city to build park facilities on the dedicated land.	Impact fees can typically be used for both land acquisition and park construction.

	Park Dedication Ordinances (PDOs)	Park Impact Fees
Calculation of land/fee (rough proportionality)	Land acreage is based on maintaining current level of service with the new development contributing its proportionate share. Fee-in-lieu is based on market value of land.	Fee is based on the capital cost of maintaining current level of service with the new development contributing its proportionate share. The fee is determined by actual or projected expenditures as determined through strategic capital planning.
Geographic restrictions (essential nexus)	Defines the geographic boundary or “service area” in which the dedicated land must be located or fees spent.	Defines the geographic boundary or “service area” in which the fees must be spent; typically more flexible than PDO nexus requirements because guided by capital planning documents.
Credits	Typically provided when developers dedicate constructed parks or when private parks are made publicly accessible.	Typically provided when developers contribute land, make park improvements, or construct parks, either as an alternative to or in conjunction with paying impact fees.
Exemptions and reductions	Cities may provide land and/or fee exemptions and reductions when certain types of housing, such as affordable or senior housing, are built.	
Alternative compliance	If a development meets the PDO or impact fee requirement by providing a privately managed park, a city can specify public access requirements for that park.	
Quality, access, and visibility requirements	Some cities provide additional specificity about the land being dedicated—e.g., that it includes park facilities such as playgrounds, or that areas of floodplain and/or stormwater management areas are minimized or excluded from the park.	Typically not applicable unless land dedication-in-lieu of impact fee provided.
<b>Implementation Considerations</b>		
Fee usage	Fees/fees-in-lieu are one-time charges dedicated to land acquisition and capital improvements. As such, they do not address maintenance and operating expenses.	
Development review process	Typically occurs during the rezoning or subdivision review and platting process. Generally overseen by planning departments, often with input from parks and recreation departments.	Generally reviewed and collected at the time of issuing building permits. Typically, the planning, building, or permitting department of a local government handles this review.
Administrative complexity	Generally straightforward to administer; however, given that each development site presents its own set of unique circumstances, PDOs may require additional staff time to ensure compliance on a case-by-case basis.	Impact fees are assessed and collected through standard government processes, but setting up these processes requires coordination across several departments, including parks, planning, capital improvements, and finance.
Timing considerations	It may take years to accrue adequate fees for land purchase. The speed and timing of fund collection from developers can influence a city’s ability to acquire land before its value surpasses the funds amassed. One resolution some cities employ is bonding, backed by a secure source, which is repaid via development fees.	

## Policy Components

**Development type applicability.** PDOs are generally applied to residential developments to ensure that new communities contribute to local park facilities. Some cities are beginning to explore the application of PDOs to commercial developments, however, recognizing the impact these projects can have on community needs for parks and recreation.

Similarly, while park impact fees are traditionally collected from residential developments, some cities have expanded their scope to include nonresidential developments, acknowledging that commercial and other types of developments also contribute to the demand for parks. This broader approach may help ensure a more even distribution of the costs associated with expanding public infrastructure and services.

**Land dedication requirements.** A land dedication requirement is the core element of a PDO. Through land dedication, a developer transfers to a city a predetermined amount of unimproved land. Impact fees sometimes allow a direct land transfer (dedication-in-lieu of impact fee), but they more typically require fees, which can be used for land acquisition, park development, or both.

**Land acquisition fees.** Fee payment is the core component of an impact fee. An impact fee is required from developers to offset the cost of city infrastructure that will need to be built to serve the new development. Impact fees can typically be used for a broader range of uses than fees associated with PDOs. Impact fees can typically be used for both land acquisition and park development.

With PDOs, many cities have an option for a developer to provide a fee-in-lieu of land when a land dedication is not suitable or feasible. These fees can be used either to acquire land or to provide capacity-increasing capital improvements to existing parks. Cities may request a fee rather than the dedication of land in several scenarios: when the amount of land to be dedicated is deemed too small to practically serve as a park, when development is occurring in an area already amply served by parks, when the available land is of poor quality, when it is not economically feasible for the developer to dedicate land, and when the land dedicated would not advance the city's overall park goals. Cities that used a fee-in-lieu expressed the importance of clearly articulating when a fee is acceptable in place of a land dedication and retaining decision-making power over whether developers will provide the land or a fee.

Of the 15 cities reviewed with either a PDO or impact fee, every one had a land acquisition fee as part of the city's ordinance—either included in the impact fee or via a fee-in-lieu option as part of the PDO.<sup>47</sup> Five based their fees on the fair market value (FMV) of the site or the zone where the site was located; three based the fee on FMV for the entire city. The remaining cities used an alternative formula cost factor to set their fees (e.g., average historical acquisition cost or a value determined by the city council). When the fee was non-site-specific (e.g., based on an average city acquisition cost) or not tied to the current FMV, it was unlikely to be sufficient to acquire enough park space for the new development. Cities reported that fees should be calibrated to reflect the cost to acquire the amount of land necessary to service the new development and should be regularly updated to keep pace with fair market value.

**Land improvement fees.** Almost all impact fees can be used for either land acquisition or park improvements. PDOs are less likely to require a land improvement fee (also referred to as a park development fee) in addition to the dedication of land or a fee-in-lieu of land. For example, half of the 10 cities reviewed for this report that had a PDO did not have a land improvement fee. Improvement fees are required to ensure that a city has adequate funding to develop a park on dedicated land or on land purchased through a fee-in-lieu of land. These improvement fees are often based on the estimated construction costs; of the five cities with a land improvement fee as part of their PDO, all but one based their improvement fee on a monthly or annually updated development cost index (e.g., *Engineering News-Record's* Construction Cost Index, which estimates local construction costs).

**Calculation of land/fee (rough proportionality).** The U.S. Supreme Court case *Dolan v. City of Tigard* established that development exactions, such as land dedications or fees, must be “roughly proportional” to the impacts of the proposed development. While *Dolan* does not address parks specifically, many states and municipalities interpret this requirement to mean that the amount of land or fee required for parks cannot exceed what is needed to maintain the city's existing level of service.<sup>48</sup> Cities take different approaches to what types of parks and facilities are included in this level of service

calculation. For example, some cities include neighborhood parks only, some include both neighborhood parks and community parks, while some might include still other types of open space and recreational areas. In almost all cases, cities use a density-based formula to account for how many people will be living in a development and using any associated parks. These formulas are designed to ensure that land dedication requirements do not insist on more park acres per person than the existing level of park service, in order to comply with the legal standard of rough proportionality. A common calculation for establishing the amount of land dedication a city should require is as follows:

$$\begin{aligned} &\text{Acres of land required for dedication} = \\ &\text{city's current level of service (park acreage per 1,000 residents)} * \\ &(\text{number of dwelling units in proposed development}) * \\ &(\text{assumed residents per unit in new development})/1,000 \end{aligned}$$

When a PDO allows for a fee-in-lieu of land, the fee total is also intended to maintain the area's existing level of park service. This can be calculated based on a valuation of the land that would have been required for dedication.

For impact fees, cities must provide a clear rationale for their calculations and application, typically supported by public facility needs assessments and capital improvement planning documents.<sup>49</sup> This process may involve conducting needs assessment studies to identify the infrastructure and facility demands anticipated from urban growth. These assessments are paired with capital improvement plans that detail the locations and timelines for public improvements. This approach ensures that impact fees are calculated based on the costs required to fund specifically defined projects in advance.

Like park dedication, the calculation of impact fees must adhere to the principle of rough proportionality, ensuring that the fees do not exceed the city's current level of service. In certain cases, however, impact fees may be used to help improve the city's level of service, provided they do not surpass this existing standard.<sup>50</sup> When aiming for a higher or aspirational level of service, cities must identify and secure additional funding sources beyond impact fees to bridge the gap between the current and desired levels of service.<sup>51</sup> In this framework, impact fees from new developments cover their proportionate share of maintaining the current level of service, while the city finances the additional costs needed to achieve the higher level of service. To avoid legal challenges, special care should be taken to ensure that impact fees are applied in a manner that proportionally contributes to increasing the level of service.<sup>52</sup>

**Geographic restrictions (essential nexus).** Cities are required to establish a clear connection—or nexus—between a development and the use of any associated park dedication or fees. The U.S. Supreme Court case *Nollan v. California Coastal Commission* requires that such exactions serve a legitimate public interest and have an “essential nexus” to the impacts of the proposed development. While *Nollan* does not require geographic proximity, many cities adopt distance-based standards or divide the city into park service zones to help demonstrate that land or fees are used in ways that are meaningfully connected to the development's impact. Cities shared several approaches to applying nexus requirements, and the pros and cons of each are explored further in [Section 3](#) of this report.

**Credits.** Some cities provide credits to developers that reduce the amount of land or fees required in exchange for providing certain improvements to a land parcel. For example, some PDOs provide credits for building a publicly accessible park on dedicated land as an alternative to paying a land improvement fee. Cities may also provide credits when a developer builds a park that will be privately owned and maintained by future residents—for example, by a homeowners association or a special district in a larger subdivision—so long as that park remains publicly accessible. Credits may be provided to developers to align PDOs or impact fees with other city priorities. For instance, cities may provide credit for environmental conservation areas that are protected during construction and integrated into the park, thus helping to advance a city's climate goals. Credit may also be given for trails that connect parks, co-located parks on school sites, or other types of open spaces that meet recreation criteria.

**Exemptions and reductions.** Some cities provide exemptions for certain housing types, such as affordable housing or senior housing. Exempting certain housing types from PDOs or impact fees is intended to prevent the land development policies from unintentionally increasing the cost of housing. However, these exemptions may also result in residents of these units not having access to nearby parks. Of the 15 cities reviewed for this report that had a PDO or impact fee, eight had an exemption for affordable or senior housing.

**Alternative compliance and governance requirements for privately owned parks and green space.** In larger-scale developments and subdivisions with privately owned parks and green spaces, cities typically establish requirements for their long-term ownership and maintenance. It's crucial to develop policies that clearly define the responsibilities for ongoing governance and upkeep of these private parks. Commonly, cities require the formation of an alternative management entity, such as a homeowners association (HOA) or special district, to manage maintenance. Additionally, to prevent the city from having to assume ownership due to neglect, some cities implement safeguards by making owners liable for funding any deferred maintenance if the management entity fails to maintain the park adequately.

**Quality, access, and visibility requirements.** Cities may set in place requirements to make sure that dedicated land and improvements are high-quality and accessible by residents. Such guidelines might address the land's accessibility and visibility from a public right-of-way, its location within a development, its size and dimensions, and its topography—including slope and maximum amount of stormwater infrastructure or floodplain. Additionally, when developers make improvements directly to the land, a city may establish rules for the types of improvements that are acceptable, often based on the city's own park development guidelines.

## Implementation Considerations

**Fee usage.** Impact fees and fees-in-lieu are one-time charges designated for the acquisition of land and capital improvements necessary for park development. They do not cover the ongoing maintenance and operational expenses of the parks they create. The fees associated with these policies support the establishment of new facilities, but the long-term upkeep of these facilities must be managed through other funding sources.

**Development review process.** Almost all cities have a development review process led by the planning department to review new proposals and ensure that they meet the city's various requirements and support long-range plans. This review process is typically the mechanism by which a city determines whether a development meets park-related requirements. Well-defined policies can ensure consistent application throughout the review process and facilitate collaboration across departments. This is crucial, as some parks departments have reported they do not have a formal role in planning departments' development review. Clear requirements and review processes also provide the planning department with a foundation to initiate discussions between developers and the parks department. This approach ensures predictability for everyone, including developers, by providing them with a defined understanding of project costs and timelines.

**Administrative complexity.** PDOs are generally straightforward to manage due to their direct application to specific development projects. Each development site presents unique challenges, however, which may necessitate additional staff time to ensure compliance. In contrast, impact fees involve more complex administration that may require coordinated efforts across multiple municipal departments, including parks, planning, capital improvements, and finance. These fees are collected through established government processes, but the need for interdepartmental cooperation can add layers of administrative complexity, especially during the initial setup of these processes.

Both PDOs and impact fees require ongoing administrative attention beyond initial setup. For instance, it is important that fees are assessed annually to account for changes in inflation and land values, ensuring that fee levels remain relevant and effective over time. Effective tracking and management of these fees are also crucial; they must be properly collected and

documented, and there should be mechanisms in place to refund them if they are not spent or contractually committed within a specified time frame—typically 5–10 years.

**Timing of transferring land or funding to the city.** There are two important considerations a city must weigh related to when to collect land or fees from developers: (1) how the timing of fee collection will influence park development and (2) whether fees will be collected at a sufficient rate to buy land or make improvements within city guidelines.

The timing of land dedication and fee collection significantly affects when a park can be developed. For instance, if a developer conveys land to a city for a park only after most of the development is occupied, the city may be pressured to quickly develop the park to meet the needs of the existing residents. If the park isn't completed when new residents move in, the city might not meet its standard level of park service, and residents might not immediately benefit from a park they have effectively paid for. To address the slow accumulation of fees, one possible solution is for cities to use bonding. This allows cities to borrow funds backed by a secure revenue source and use future impact fees to repay the borrowed amount.<sup>53</sup>

## Main Challenges for Implementing Park Dedication Ordinances and Impact Fees

As outlined in the previous sections, when designing PDOs and impact fees, cities have much to consider—from understanding their legal authority, to determining levels of service, to developing a process for reviewing development plans. While these aspects of policymaking are challenging in their own way, they tend to be technical obstacles that can typically be solved with expertise and additional resources such as better data tracking and more staff time for plan reviews.

Cities also face deeply complex questions and challenges concerning the intersection of urban growth and park equity. These challenges are systemic: they are tied to long-standing patterns both embedded in the built environment and entrenched in local government policies and processes. Meeting these challenges requires reflection, a willingness to learn, and a long-term commitment to change. Land development policies, or a lack thereof, have driven many of the issues of inequities in the built environment; consequently, they can also be part of the solution. Linking PDOs and impact fees to the complex challenges cities face, while leveraging the technical components of these policies for equitable park creation and access, is a primary goal of this report.

TPL researchers held interviews and discussions with city staff to determine the main challenges cities encounter when implementing PDOs and impact fees. The questions city staff raised reflect both the technical and adaptive challenges they face when assessing how these policies can increase park access and close the park equity gap in their cities. Subsequent sections of this paper detail these three core challenges and provide examples of how practitioners are innovatively addressing them through their local land development policies.



## SECTION 2

# Planning for Growth



© ADRIAN SANCHEZ-GONZALEZ

## How Can Cities Ensure That Park Creation Keeps Pace with New Development and Population Growth?

As many U.S. cities experience population growth,<sup>54</sup> it is essential that local governments continue to provide residents with parks. As cities grow—upward or outward—and land becomes scarcer, cities are at risk of failing to meet their local park needs if park development does not keep pace. Park agencies, which across the country are historically under-resourced, may struggle to stay abreast of broader development trends and increasing populations. When not sufficiently resourced, park agencies are often forced to make difficult decisions about how to serve new residents as well as existing ones.

Recent studies comparing park creation and population growth show that parks are not keeping pace with growth. An analysis of TPL's City Park Facts data found that, among the 100 most populous U.S. cities with available data, nearly two-thirds had less park acreage per resident in 2023 than in 2016, with an average decrease in park acres per resident of 5 percent over that time span. (See [Appendix D](#).) In another TPL study, a series of interviews with staff from 12 cities in the mid-2000s found that only one city of the 12 confirmed that it was adding enough park acreage to keep up with population increases. Five of the 12 confirmed that they were not keeping up. Half of those cities were unable to evaluate due to a lack of basic data.<sup>55</sup>



Recent studies comparing park creation and population growth show that parks are not keeping pace with growth. An analysis of TPL's City Park Facts data found that, among the 100 most populous U.S. cities with available data,

**64% had less park acreage per resident in 2023 than in 2016,**  
with an average decrease in park acres per resident of 5% over that time span.

A study of park creation and development in 50 Texas cities found that 70 percent of these cities (35 of 50) had less park acreage per resident in 2020 than in 2008.<sup>56</sup> Texas cities with faster population growth were more likely to see decreases in their park acreage per resident. The study also found that the Texas cities with park dedication ordinances (PDOs) were somewhat better able to match park creation with population growth.

Through interviews conducted for this report, city staff expressed that this divergence between park acreage and population is straining cities' existing park infrastructure. PDOs and impact fees have the potential to help mitigate these issues if they are carefully tailored to meet local needs. Currently, however, many of these policies are inadequately designed for park creation to keep pace with urban growth.

TPL researchers surveyed city staff from 37 cities participating in the Community of Practice (CoP). In survey responses, 40 percent of those responding indicated that they were not satisfied with their city's park dedication requirements and/or impact and development fees, while 27 percent said they were "very satisfied." Seventy-five percent of CoP participants shared that they either agreed or strongly agreed that developers play an essential role in how cities are acquiring land and/or building new parks.

These studies highlight significant concerns and prompt questions about population growth and park access. It is a concerning trend that cities are experiencing population growth without corresponding increases in park acreage. More research is needed to fully understand the dynamics between local population growth, park acreage, and park access, however. For example, if new developments and resulting population increases are located near existing parks with the capacity to handle more users, a reduction in park acreage per resident might be justifiable. On the other hand, the construction of new neighborhoods without sufficient park space establishes a pattern in the built environment that can be challenging to reverse and may impact park access—and park equity—for generations.

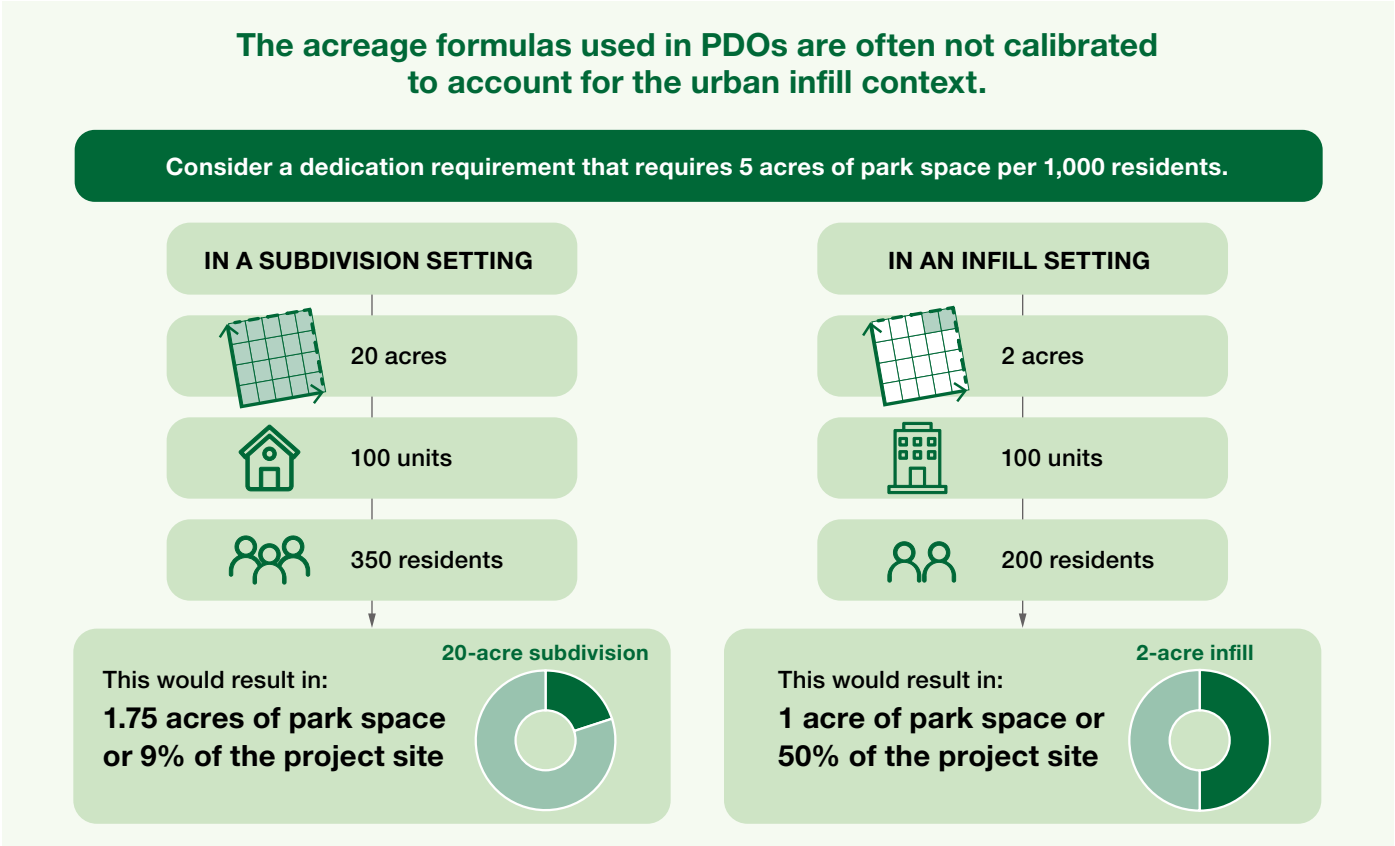


# Three Reasons Park Creation Is Not Keeping Up with Population Growth

Through interviews with city staff and a review of policies, TPL researchers identified three primary reasons that development policies—both in design and application—do not advance park creation in line with population growth.

## 1. Park dedication ordinances and park impact fees are not always calibrated to reflect the true cost of land acquisition, park development, and park maintenance.

Land and fee requirements may not be effective if they don't account for rising costs or if they fail to differentiate between the varying needs and costs of land in less dense subdivisions and denser urban centers. For example, the acreage formulas in park dedication ordinances are typically designed for subdivisions. When these formulas are applied to urban infill developments, which are typically much denser, they often set unrealistic dedication requirements. For instance, consider a 20-acre subdivision with 100 units housing 350 residents, which averages 5 units and 17.5 residents per acre. Contrast this with a 2-acre multifamily site that also has 100 units but only 200 residents, reflecting a much higher density of 50 units and 100 people per acre. If the dedication requirement is 5 acres per 1,000 residents, it would necessitate 1.75 acres from the subdivision and 1 acre from the multifamily site. That 1.75 acres is only 9 percent of the subdivision site, while the 1 acre is 50 percent of the multifamily development site. It is much more feasible to set aside 9 percent of a site for a park than half of it. In almost all cases, this results in urban infill developers paying a fee-in-lieu, which creates a different set of complications, including increasing the cost of infill development, which may run counter to a city's broader housing goals.



On the other hand, a fee or fee-in-lieu of land may not be sufficient to acquire land in the urban core because either (1) the fee formula is not constructed to reflect actual market value, or (2) by the time the city has collected enough fees to purchase the land, the land has increased in price beyond the original assessment formula. Addressing these two challenges will likely require formulas that reflect site-specific acquisition costs and flexibility about what land is available, rather than citywide standards. A review of PDOs across 73 Texas cities found that only 13, or 18 percent, based their fee formula on the fair market value of the land being subdivided. A similar number, 12 cities, use a fair market assessment but rely on a broader radius. The remaining 48 did not specify their formula mechanism.<sup>57</sup> In the analysis of 20 cities conducted for this paper, 15 cities were found to have fee options for land acquisition within their policies, either as an in-lieu option under a PDO or as impact fees. Among these 15 cities, however, only 5 calculated their fees based on the fair market value of the land or the specific zone where the development was located.

Fees from PDOs and impact fees may be pooled together and used for acquiring land, developing it, or both, once enough funds have accumulated. This process involves two main complications. First, there can be a significant delay between the collection of these fees and the eventual purchase of land and creation of parks. This delay can disadvantage developers who begin construction in an area before park investments are made, as the lack of nearby amenities may make it harder to sell or rent residential units. Second, the delay means that land costs will likely increase beyond the original projected value, requiring more funds to be collected than originally required. The effectiveness of these fee collections is further reduced when the initial amounts are insufficient for purchasing land or making improvements, leading to smaller, ineffective accumulations of funds. Additionally, the value of a land parcel may increase when the city shows interest in acquiring it, further complicating the situation.

Another challenge in accurately calculating land and fee requirements relates to how cities define their level of service, which must adhere to the legal standard of “rough proportionality”—meaning the amount of land or fees dedicated must be proportional to maintaining the existing level of park service. Different cities include various types of parks in this calculation: some count only neighborhood parks, others include both neighborhood and community parks, and some consider additional types of green spaces. Given that dedication requirements are capped by maintaining the existing level of service, cities should consider including a broader range of parks to reflect the diverse usage by residents of new developments.

## **2. Cities do not always have financial or staffing capacity to build a park on vacant land transferred as part of a dedication requirement.**

When land is dedicated to the city, it may come without any physical improvement or the funding to convert the site into a high-quality park. Of the 10 cities reviewed in this report with a park dedication ordinance, five had a separate land improvement fee that supplemented the dedication requirement to ensure a park would be built. Cities without a land improvement fee reported that, as a result, dedicated land could remain vacant for years before being developed into a park. This delay was typically caused by one of two factors: (1) the city did not require developers to build the park as part of the dedication process, or (2) the city lacked sufficient funds to develop the park at the time the land was acquired.

For example, in Colorado Springs, Colorado, the city can only use fees collected as part of its PDO for acquisition of new land, not the development of that land into a park. In a best-case scenario, this results in the city accumulating undeveloped land while awaiting available funds to develop the land into a park. In a worst-case scenario, the acquisition fees cannot keep up with inflation either, meaning that the city is often unable even to purchase land for future development.

Additionally, the characteristics of the dedicated land can significantly affect the feasibility of park development. Even if enough land is dedicated, certain conditions, such as steep slopes or floodplains, may complicate its development into a

park. There is a history of successful conversion of “undevelopable” land into valuable park spaces across the country, but these transformations are not easy. Challenging land conditions increase both the complexity and cost of developing the land into a functional park.

Of the 10 cities reviewed in this study with a PDO, seven had some version of minimum criteria for land to be dedicated as park, such as requirements for floodplains, slope, and frontage. These site-selection criteria should prompt cities to explore strategies that balance the land used for parks, housing, and other types of development. In cases where cities prioritize “less-developable” land for parks, they should ensure that they have sufficient funding and staff expertise to convert this land into parks.

A second important consideration among a smaller set of cities is the presence of an open space dedication requirement, as distinct from a park dedication requirement. This results in land being set aside for essential public infrastructure such as sidewalks and trails or primarily left as conservation or environmental management areas. In interviews, cities that have had more success in maximizing open space dedications have used them to expand their greenway networks or for multiple purposes, such as a stormwater management area that does double duty as park space. Greenways are typically easier to adapt to a challenging terrain than a neighborhood park development would be, because they mostly include paths, while parks generally entail more space to serve multiple purposes, such as recreational activities, social gatherings, and green infrastructure.

Across our interviews, city staff expressed a wide range of preferences for what should be required in terms of minimum criteria. Some cities want very clear, stringent criteria on what types of lands should be accepted by cities. Others want to be able to make decisions on a case-by-case basis. Across almost all cities, staff shared that ensuring a clear view into the park via frontage requirements can help maximize its potential benefits.

### **3. Cities lack the data, staff, and systems to enable better coordination and understand how their development policies are—or are not—working.**

Cities rarely have sufficient data and systems to understand the full scale of how their park dedication ordinances and impact fees are shaping local park access. Cities reported that, to enable better coordination between city agencies, better investment is needed in staff dedicated to tracking both public and private parks in the city’s overall park system—whether in the parks and recreation agency or in the planning department. In a 2013 study on park dedication ordinances and impact fees in 12 cities across the country, TPL researchers found that only six had sufficient data to track their program’s land acquisition and development outcomes.<sup>58</sup> Recent interviews with city staff and conversations with CoP participants confirmed that cities continue to lack training and data management systems. Without data on land and fees, cities may not have a full picture of how their policies are tying into broader park goals.

In some cities, parks and recreation agencies lack the resources to manage small parks, convert lower-quality land into usable parks, or review development decisions effectively. As a result, these agencies may accept only land dedications that meet a minimum size requirement, as maintaining scattered small parcels across the city can be cost-inefficient. For instance, in Fort Worth, Texas, the city does not accept land dedications smaller than 5 acres. This requirement is stipulated in the dedication ordinance, leading smaller developments to pay fees-in-lieu instead. This points to an opportunity to align comprehensive plans and land subdivision requirements to ensure the effective siting of adequate land early in the subdivision mapping process.

In a related issue, many local agencies lack funding or staffing to develop floodplains or other environmentally challenging areas into parks or recreational experiences. Managing floodplain recreation can be time intensive and expensive. While

the dual purpose often leads to net savings, the lack of an explicit staffing and resourcing model can create a barrier to effectively converting these landscapes into accessible parks and recreational spaces that serve the community. Some cities are working to cross-train staff from different departments. For example, Des Moines, Iowa, is conducting cross-training with parks and public works staff on management of green infrastructure and native plantings to ensure that the city's public spaces—regardless of agency ownership—are efficiently maintained.

Several cities shared that, in drastic situations, they have received a land dedication but have not been informed about their ownership responsibilities until after the city accepted the land. This relates to a separate issue: parks and recreation departments might not be fully integrated into decision-making related to property development. This makes it hard to appropriately plan and manage parks and green space.

An additional benefit of tracking these data is a certain predictability, so developers know what to anticipate when budgeting for new projects. When cities have a better sense of how their park dedication ordinances and impact fees are shaping local park access, they can make more strategic decisions about when to prioritize the dedication of land or fees, or when to allow for developers to meet requirements through alternative pathways. The increased clarity on the part of the city has a secondary effect of creating increased predictability and efficiency for developers who are undergoing development review with the city; they will have a better understanding of what will be required from them based on what they are building and where.

## Key Considerations from Community of Practice Participants

The following are key suggestions from CoP participants for cities to consider when reviewing or creating policies to ensure park creation keeps pace with population growth.

### 1. Overall considerations:

- a. Park dedication ordinances should include a land improvement fee or other strategy to ensure parks are built and should not simply be focused on land acquisition.
- b. City planning and parks and recreation should have more formal coordination concerning park dedications and park siting early in the land subdivision process, including investment in data-tracking systems.
- c. Cities should ensure that the requirements of any fee-in-lieu of land or impact fee are written in a way that enables timely acquisition of land.

### 2. Considerations for land acquisition:

- a. Cities should calculate acreage requirements based on the existing level of service provided by all park types (e.g., neighborhood parks, community parks, and open space), rather than neighborhood parks only.
- b. Cities should calculate acquisition fees (whether for fees-in-lieu or impact fees) using an empirical, site-specific calculation to ensure fee levels are sufficient to acquire land in the targeted area, rather than using a citywide average or outdated cost assumptions.
- c. Cities should consider either ensuring that land quality criteria (e.g., floodplains and slope allowances) are sufficient for park development or investing in the agency staffing necessary to convert challenging open space into creative parks.

### 3. Considerations for park development:

- a. If requesting land improvement / park development fees, cities should ensure that they are sufficient to develop the type of land being dedicated into a park (e.g., challenging land likely entails higher park development cost).
- b. As an alternative to land improvement fees, cities should consider the feasibility and benefit of having developers build and dedicate the park as they build the rest of the development.
- c. Cities should consider potential benefits and drawbacks of allowing developers to provide privately managed but publicly accessible parks as an alternative compliance approach. This topic is discussed further in [Section 4](#) of this report.



## SECTION 3

# Planning for Access



© TEGRA STONE NUSS

## How Can Cities Leverage Their Land Development Policies to Build Equitable Parks for All?

**T**he previous section of this report highlights the fundamental need for parks to keep pace with population growth. It also identifies three key reasons land development policies are not advancing park creation quickly enough to meet demand. In addition to impacting the pace of park creation, these policies also influence where parks are developed and improved—directly affecting who has access and to what types of facilities.

During interviews with city staff, a recurring concern was raised: most park dedication ordinances (PDOs) and impact fees are structured in a way that fails to account for residents' use of varied park infrastructure across the entire city. Development policies that fail to account for the full range of ways residents use a city's park system risk perpetuating inequitable park access. Narrowly defined policies can lead to park creation being concentrated in areas of high economic growth, while other parts of the city's park infrastructure suffer from increased usage without a corresponding investment to support the growth in usership from new developments. Another result can be misaligned investments—for example, by requiring a new neighborhood park to be created in an area where the need is already met, when greater impact could be achieved by funding increased capacity in community parks.



TPL policy analysis revealed that, when determining where dedicated land must be located or where collected fees must be spent, most cities emphasize close-to-home neighborhood parks in their nexus definitions, but they often do not adequately consider how new residents also engage with park infrastructure throughout the city. Discussions with city staff and reviews of their development policies identified two key limitations in how land development policies restrict cities' ability to effectively address park infrastructure needs: (1) the city's nexus definition often fails to reflect citywide park utilization, and (2) land dedication and fee requirements lack the flexibility to address gaps in park access. When these issues are addressed, the entire community, including new development, benefits from a comprehensive park system that meets local, community, and regional needs.

## Two Opportunities to Increase Flexibility in Land Development Policies

Cities have traditionally adhered to a strict interpretation of nexus guidance, requiring land to be dedicated or fees to be spent on-site or in close proximity to the development. Although nearby parks are crucial, a narrowly defined nexus overlooks the reality that residents will also rely on parks throughout the city to meet their recreational needs.<sup>59</sup> This includes not only neighborhood parks but also larger community and regional parks that provide diverse amenities and recreational opportunities. Recognizing this, some cities are introducing more flexibility into their policies to maintain compliance with "essential nexus" requirements while also addressing impacts to the broader park system. Cities typically do so by revising their nexus criteria and modifying their requirements on the allocation and usage of dedicated land or fees.

The ability of a city to create a broader nexus or flexibility in land dedication and fee requirements may depend on a city's legal risk tolerance and political will. Several cities shared that legal teams or director-level staff rely on a more conservative interpretation of what is allowable for parkland dedication ordinances, while other cities are comfortable with a more expansive interpretation. Creating flexibility can also be politically fraught. For example, a study of park impact fees in Los Angeles found that, although the city's policy allowed for greater flexibility in spending fees across broader areas, the funds were typically spent within the council district where they were collected.<sup>60</sup> Political dynamics and localized priorities can make it challenging to achieve the flexibility needed to redistribute funds equitably across different areas of the city.

### 1. Adopted nexus requirements do not always reflect citywide park utilization.

Nexus requirements are perhaps the most important tool for defining a city's flexibility regarding the distribution of land and fees generated by land development policies. The U.S. Supreme Court, in its *Nollan v. California Coastal Commission* decision, affirmed that there must be a rational "nexus" between the impacts of a proposed development and the conditions imposed on that development—such as land dedication or fee payments. For the purposes of parks, cities typically demonstrate this nexus in two common ways. One approach is to require that a park funded or created through the development be located within a specified distance—for example, within one mile of the project site. The other is to divide the city into service zones, requiring that land or fees collected from a development be used within the same zone. Some cities define the entire city as a single zone, while others divide it into multiple distinct zones. Cities may also apply different nexus standards depending on whether land is being dedicated or fees are being assessed.

A city's nexus requirement can greatly impact the degree to which dedicated land or fees address park need. If land is not available for acquisition within a designated zone, an area might receive fees but still not see parks developed. Several cities have expressed that their nexus requirements force them to collect fees or look for land in areas that are already

well served by parks or might not have any more land available for purchase, while other areas that have less development continue to experience underinvestment. Similar issues were identified in research from nearly 20 years ago, illustrating the ongoing challenge related to properly defining nexus requirements.<sup>61</sup>

Some cities are working to provide flexibility within their nexus requirements to address these challenges. For example, Colorado Springs, Colorado, is providing flexibility in how funds can be allocated by allowing a portion of its PDO revenue to be applied to community parks anywhere in the city, with the rationale that such parks have a wider service radius than neighborhood parks and thus still support residents of a new development. In these circumstances, if a neighborhood's park needs are met, the city retains flexibility to address system-level needs elsewhere in the city. Portland, Oregon, has constructed a two-zone system: one zone encompasses the downtown area, and the other applies to the rest of the city. That, in turn, provides flexibility for spending outside the downtown zone.

When using a zone-based approach, some cities create zones that allow for distribution of funds that reflect citywide park utilization. For example, cities might create a citywide zone within which a portion of collected fees can be used for community or regional parks that will be utilized by residents of the new development. Additionally, several cities are creating zones specific to the characteristics of a neighborhood, such as a downtown zone, that better reflect local development costs and usage patterns. Of the 15 cities with a dedication ordinance or impact fee, more than half used a zone-based approach; the remainder employed a distance-based approach or, in two instances, a citywide approach.

Some cities are also broadening the geography of their nexuses to allow for a more equitable distribution of funds. For example, Madison, Wisconsin, reduced the number of zones where fees can be spent within the city from 11 to four. It also increased the geographic size of those four zones to spread funds across its neighborhoods with more flexibility.<sup>62</sup> At the same time, it created a citywide fund for a portion of fees collected to distribute funds more equitably across the city. Similarly, San Diego, California, has instituted a new citywide park development impact fee.<sup>63</sup> Through 2026, at least 80 percent of the citywide impact fee must be invested in park-deficient communities as defined by the city.<sup>64</sup> In Los Angeles, California, the city has loosened its nexus requirement in an effort to redirect funds toward communities that are experiencing little development, although an evaluation of the work in Los Angeles has found mixed efficacy.<sup>65</sup>

In addition to allowing for a more equitable distribution of funds, creating a broader nexus can give cities more discretion in selecting land for park development and allow for the creation of a greater range of park types that serve all residents. This broader discretion should be guided by park system master planning to ensure that decisions about park development are aligned with long-term goals for equitable access, diverse park offerings, and strategic growth across the entire park system.

## **2. A lack of flexibility in fee and dedication requirements can restrict a city's ability to address gaps in park access.**

A land-only dedication is the most rigid method of structuring a park dedication ordinance. Cities are beginning to provide a greater range of options that consider the park needs of growing populations within the city's broader park goals. For example, cities may structure their park dedication ordinances to require a fee-in-lieu of land option when the land dedicated would not advance park agency goals.

In Austin, Texas, the city has mapped "park-deficient areas" based on a level of service analysis. When a development falls within that area, the city is likely to require the developer to dedicate land rather than pay a fee-in-lieu of land. When a development is not within the park-deficient area, the city may prioritize a fee-in-lieu instead. This helps the city leverage development trends as part of the solution to its wide-ranging, system-wide park needs. Tools such as TPL's ParkServe®

mapping platform provide easy-to-use datasets to identify “park-deficient areas” if they haven’t yet been identified in a given city. The platform includes every urban park in the U.S. and identifies the neighborhoods within each city that don’t have a park within a 10-minute walk.

Other cities, such as Aurora, Colorado, are working to bolster flexibility in terms of how much land the city will accept. Aurora generally does not accept land dedications for parks that would be less than 5 acres. For large greenfield developments, Aurora requires that developers dedicate land in accordance with the city’s standards, which mandate 7.8 acres of open space, 3 acres for neighborhood parks, and 1.1 acres for community parks per 1,000 residents. When small infill or transit-oriented development projects are planned, however, the city waives the open space acreage requirement and allows for a “small urban park” to meet neighborhood park requirements on-site with the remainder of land requirements paid via a fee-in-lieu. This ensures that even in higher-density, more costly areas of the city, the development policy supports the city’s overall park system goals.

## Development Policy, Parks, and Gentrification

Among public park advocates and many of the city staff interviewed as part of this study, there is concern that park creation or renovation could result in the alienation, exclusion, or displacement of long-term residents and businesses through a process referred to as green gentrification. Investment in parks is essential but can also lead to rising rents and property values, exacerbating the risk of displacement if not managed with inclusive, community-stabilizing strategies.

Park development does not necessarily lead to gentrification or displacement, however. A study by Alessandro Rigolon and Jeremy Németh, which analyzed the gentrification impact of 621 new parks and greenways across 10 U.S. cities between 2000 and 2015, found that not all new parks lead to gentrification.<sup>ii</sup> They found that most gentrification risk was associated with just two types of parks: (1) iconic greenways such as New York’s High Line, The 606 in Chicago, and Atlanta’s Beltline, and (2) parks close to downtown areas.<sup>66</sup>

Less is known about the effect of park development policies, such as PDOs and impact fees, on gentrification and displacement. Some of the research that does exist points to development fees being directed disproportionately to communities that are either gentrifying or at risk for gentrification.<sup>67</sup> Additionally, the common practice of exempting affordable housing from park dedication and fee requirements necessitates further research to understand the impacts of these policy choices on park access for people living in affordable housing. Further investigation is needed to explore how these policies contribute to the complex social and economic factors that drive displacement.

---

ii For this study, Rigolon and Németh defined gentrification as an increase in a neighborhood’s income level, education level, or housing value that is steeper than the city’s median increase.

As cities implement development policies aimed at improving their park systems, they must also pair these policies with strategies to reduce displacement risk. Cities can learn from existing models that show how policy can be an important tool for more equitable development. Research by Alessandro Rigolon and Jon Christensen highlights this potential: in their review of 27 park projects across 19 cities, they documented 26 different types of parks-related anti-displacement strategies (PRADS). These strategies included anti-eviction protections for renters and property tax freezes for homeowners, which can safeguard existing residents from displacement due to rising local prices. The report also identified ways policy could incentivize the development of affordable residential housing units, such as by offering density bonuses.<sup>68</sup> Cities are encouraged to continually monitor the impacts of park investments on housing prices, gentrification, and displacement to develop, adapt, and refine interventions that address these pressures over time.

For more information, see TPL's recently released research report, [Great Parks Should Not Uproot Communities](#), which reviews the growing literature on green gentrification risk factors and anti-displacement strategies for cities.<sup>69</sup>

## Key Considerations from Community of Practice Participants

The following are key suggestions from CoP participants for cities to consider when reviewing the ability of their land development policies to address new residents' citywide park utilization.

### 1. Considerations when refining the city's nexus requirement to allow fees to be used to advance system goals:

- a. Track the park types and level of service across the city to understand where the city might have flexibility to prioritize community-wide or neighborhood-specific improvements to meet overall goals for level of service.
- b. Whether using a zone-based or distance-based approach, consider having a separate "citywide" fund, to which a portion of fees can be added. This allows for the application of funds to community or regional parks that serve both the new development and other neighborhoods. A city's ability to use such a fund may depend on local or state legal guidance.
- c. If using a zone-based approach, consider how best to construct zones based on your local context to allow for funds to meet a wide range of park needs—for example, by having larger zones that allow for a broader distribution of funds across the city.

### 2. Considerations in creating flexibility for PDOs or fees to address existing gaps in park access:

- a. Include flexibility in your PDO to allow for land dedication, fee-in-lieu of land, and varied sizes and types of dedicated land (e.g., small urban parks in dense urban areas). This flexibility should be complemented by clear guidelines establishing the specific contexts and circumstances under which each type of dedication or payment can be made.
- b. Use tools such as TPL's ParkServe® mapping platform to understand current park access gaps, and make sure that your PDO and impact fees prioritize land dedication and park creation in those areas when development occurs nearby.

## SECTION 4

# Public-Private Partnerships



© TERRAY SYLVESTER

## How Can Public-Private Partnerships Be Fostered to Provide and Manage Parks While Ensuring That Public Access Remains a Core City Value?

Even when cities adopt park dedication ordinances (PDOs) and impact fees to expand their park systems in line with population growth, park agencies often face fiscal constraints that limit their ability to manage additional facilities. In response, cities may offer developers the option to satisfy PDO and impact fee requirements by providing parks that are privately managed, yet publicly accessible. This approach aligns with a broader objective of many cities' economic development agencies: leveraging private-sector development to serve both public and private interests. By investing in parks, the private sector can contribute to the public good, strengthen ties with the community, and gain a strategic advantage in attracting and retaining a diverse workforce. Additionally, this collaborative approach can help communities attract new workers, businesses, and development opportunities, ultimately strengthening the community's overall fiscal health.

These public-private partnerships must, however, be understood within the context of the financial strain cities are currently facing. As of the 2022 fiscal year, public funding for city parks in the 100 most populous cities remained below pre-2007 Great Recession levels.<sup>70</sup> This has contributed to a significant backlog of maintenance work in existing parks.



A National Recreation and Park Association (NRPA) study estimated that city parks and recreation agencies would need to spend \$60 billion just to address current maintenance issues.<sup>71</sup> In light of this backlog, CoP participants highlighted a key potential pitfall of privately managed parks: the concern that they could be used to justify cuts to city parks and recreation budgets.

CoP participants also highlighted two additional concerns regarding the privatization of park management. First, there is a fundamental worry about shifting values related to publicly managed lands. Parks have traditionally been viewed as public assets managed for the public good; transferring their management to private entities raises concerns about the potential erosion of these values. Second, ensuring parks remain open and accessible to the public becomes more challenging under private control. Participants emphasized the need to maintain public access and foster an inclusive, welcoming environment. These concerns highlight the complexities of balancing efficiency and the public interest in the context of privatized park management.

Acknowledging these and other challenges, cities are exploring alternative management and financing for parks for the 21st century. In this section, we refer to these as “alternative management entities” (rather than “private”) to include both private (e.g., real estate developers or property managers) and quasi-public (e.g., special district or business improvement district) partnerships. With the ongoing tension between desires for private open space and for public open space, CoP participants emphasized the need to proactively structure these alternative approaches to ensure that accessible, welcoming public spaces remain a core city value.

## How the Prevalence of Alternative Management Entities Is Influencing Park Accessibility

CoP participants identified two key factors that influence decisions regarding public access to privately managed parks: the types of organizations that could manage these parks and the financial mechanisms that support their operation. Our interviews and research found that public access remains a central value for parks and recreation agencies, and ensuring ongoing access to privately managed spaces is achievable. In four cities that provided data, 73 percent of their publicly accessible parks opened in the past five years are managed by private or quasi-private entities, such as homeowners associations, business improvement districts, and private institutions including museums.

### Alternative Management Entities

When a developer builds a park without transferring ownership to the city, management is often handed over to one of four common alternative management entities: special districts, business improvement districts, homeowners associations, or property managers.<sup>iii</sup> These entities offer more design and management control to the “buyer” (e.g., commercial tenants or homeowners), as they are not bound by citywide regulations and standards for operation. These entities can also benefit city governments by providing additional funding and management capacity beyond what the city could take on independently. Several common approaches exist for managing parks through these alternative entities.

- **Special districts** are one of five types of local governments as classified by the U.S. Census Bureau and typically require authorization from a geographic population or their elected representatives.<sup>72</sup> Special districts are created to finance,

---

<sup>iii</sup> We exclude other private management entities, such as park conservancies and private institutions (e.g., museums), because they typically do not manage parks created via a city’s development policies.



design, develop, and operate public improvements (e.g., parks and recreation facilities) when an existing municipality would prefer not to or is unable to do so. Common advantages of funding public infrastructure for new developments through special districts include the following: (1) the infrastructure is “off balance sheet” for a municipality, meaning that it doesn’t count against statutory limits on how much the municipality is allowed to borrow; (2) the cost of the development is limited to those who will directly benefit, rather than being spread across the full municipality; and (3) developers prefer this approach over impact fees because it allows them to spread the cost over many decades instead of having to factor it into the unit cost of a development. Disadvantages include fragmentation of governmental services and tax rates, including confusion among residents about who is responsible for services. Special districts are usually authorized via a combination of state and local authority. They can be formed as single-purpose districts—for example, a park district—or multipurpose, with parks being part of a set of public services the district provides. Special districts primarily function as a development tool—solving for the challenge of how to pay for public infrastructure in a new development when a municipality does not use its existing bonding authority to do so.

- **Business improvement districts (BIDs)** are defined geographic locations within whose boundaries businesses are required to pay an additional tax or levy to fund projects; BIDs can also draw on other public and private funding. BIDs are generally operated by a nonprofit organization with full-time staff and a board of directors. BIDs provide a wide range of support for business owners within their boundaries, from enhanced sidewalk cleaning to conducting advocacy for members to funding capital improvements. BIDs often help maintain, clean, and program parks within their boundaries. They may also help with other beautification efforts such as tree planting or greening. Establishing a BID typically requires authorization from the city and support among business owners within its proposed boundaries. Requirements that vary from state to state may govern the implementation of a BID, including enabling legislation. About 40 states have legislation governing BIDs.<sup>73</sup>
- **Homeowners associations (HOAs)** are fully private organizations typically funded through homeowner fees and tasked with managing a range of responsibilities, including park maintenance. CoP participants mentioned frequent areas of concern for HOA-managed parks, including that in some instances, changes in the HOA’s financial situation may prevent it from fulfilling its upkeep obligations related to privately developed parks. Additionally, HOAs are often run by volunteers without experience or incentive to manage for the general public’s use of their facilities, potentially leading to mismanagement. Another challenge with HOAs is they might implement practices that discourage or even restrict nonresidents from accessing these parks, limiting their value as public spaces.<sup>74</sup>
- **Property managers** are private entities responsible for the management and ongoing maintenance of a park or other privately owned public space. They are most common in commercial, mixed-use, and multifamily residential settings. For example, a property manager may be responsible for upkeep of a small plaza or pocket park in front of a downtown building or for open space and trails within an office park. Property managers are primarily funded through rent payments.

**Table 4.1. Approaches for Alternatively Managed Parks**

	Entity	Management Type	Finance	Examples of Public Access
<b>Subdivisions</b>	Homeowners associations	Private (typically volunteer-run); either opt-in or requirement of deed for specific geographic boundary	Annual fees	Numerous, but typically informal
	Special districts	Quasi-public; authorized by population or their elected officials; board typically represents developer interests	Bonding authority and annual “tax” assessment	Colorado’s Metro Districts and Austin’s various districts
<b>Urban Core</b>	Property managers	Privately operated (typically professionally managed)	Rent payments	New York City’s privately owned public spaces <sup>a</sup> San Francisco’s privately owned public open spaces <sup>b</sup>
	Business improvement districts	Quasi-public; authorized by elected officials and typically must be agreed upon by a minimum percentage of property owners	Annual fees	Washington, DC’s BIDs Philadelphia’s BIDs (e.g., University City District <sup>c</sup> and Center City District <sup>d</sup> )
<b>Office Parks</b>	Property managers	Privately operated (typically professionally managed)	Rent payments	Infrequent

a New York City Department of City Planning. (n.d.). *New York City’s privately owned public spaces*. <https://www.nyc.gov/site/planning/plans/pops/pops.page>.

b San Francisco. (n.d.). *Privately owned public open spaces*. <https://sfpopos.com/>.

c University City District. (n.d.). *Transforming public spaces*. Philadelphia. <https://www.universitycity.org/transforming-public-spaces>.

d Center City District. (n.d.). *Center City District parks*. Philadelphia. <https://www.centercityphila.org/parks>.

## Financing

A core tension in land development policies involves who should pay for the creation of public infrastructure for new development. A primary purpose of dedication requirements and impact fees is to ensure that new development covers the proportionate costs of the public infrastructure it necessitates, but these policies generate one-time dedications and fees to cover park creation, not ongoing operations. On the other hand, alternative management entities can help fund both the creation and the ongoing maintenance of new parks. Homeowners associations, property managers, business improvement districts, and special districts all provide a mechanism for collection of annual fees or rental income to fund the ongoing maintenance of parks that serve members or tenants. In addition, special districts offer a way to finance the construction of parks over many years. States often give this authorization to issue debt backed by an annual assessment (effectively, a tax) on property owners in the district.

While these alternative management structures effectively solve the problem of how to fund a new development’s park infrastructure, they can also perpetuate park equity gaps between high- and low-resourced neighborhoods.<sup>75</sup> Equity gaps could widen if alternatively managed parks are used to justify decreasing park investment in other neighborhoods. For example, CoP participants shared concerns that city officials might view parks managed through alternative means as fulfilling the city’s overall park needs, thereby justifying cuts or limitations to the parks department’s budget. Instead, officials should ensure that alternative funding contributes to expanding the pool of resources available for parks, rather than endorsing reductions or accepting the stagnation of park funding.

## Lessons Learned from Park Conservancies

Strategies to ensure that alternative management structures, such as the four described above, contribute to expanding the overall funding pool without exacerbating existing inequities can be drawn from recent debates about the roles of park conservancies or “friends of” groups. Although these privately managed groups tend to support publicly managed parks, they have been challenged with the same question: whether their presence exacerbates park inequity, by channeling private dollars into parks in affluent neighborhoods, or ameliorates it, by increasing the overall park-funding budget.

For example, the Central Park Conservancy, a nonprofit that manages New York’s Central Park on behalf of the parks department, can provide many lessons in this regard, having been the subject of considerable debate. As a result of these discussions, the Conservancy for many years has allocated substantial funds and technical assistance to support parks throughout New York City, as part of the Conservancy’s Five Boroughs Program.<sup>76,77</sup> Although alternative management of parks can offer benefits, cities should be aware that it might contribute to inequitable outcomes, particularly if used as a justification for decreasing investment in other areas. This note of caution does not render these approaches irrelevant; when they are employed, however, city leaders should be aware of the potential for widening inequities.

## Public Access

When an alternatively managed park is provided as a compliance option for a PDO or impact fee, cities may often require public access. A similar situation could arise through negotiations or incentives, with the city exchanging increased development rights for a publicly accessible park. In these scenarios, a common question is how to ensure that these spaces truly provide public access—as well as what counts as a park. When privately developed and alternatively managed parks are required to provide public access, cities should lay out clear guidelines about the space’s accessibility from a design perspective, its permitted uses, rules (including hours of operation), messaging indicating public access, and protection from future development.

Some cities have put in place clear standards for privately owned public spaces to ensure that these areas remain accessible to residents and are utilized by the public. New York City’s privately owned public space (POPS) program has long been considered a standard-bearer for this assurance. After 60 years of practice, the city’s planning department now requires four critical components to confirm public access: (1) clear design principles, (2) publicly visible signage with common elements and the logo of the POPS program, (3) the ability to enforce maintenance, and (4) the ability to list the site on a publicly available website. Even this program struggles with enforcement, however. A recent analysis by the *New York Times* found that nearly one in five POPS properties does not comply with the city’s program requirements.<sup>78</sup>

This approach is not limited to dense urban areas. Cities with significant planned communities, such as Henderson, Nevada, and Irvine, California, have developed approaches that balance private development and public access. In these cities, developers build the parks as part of the new community, and then the parks are typically managed by the HOA or share joint management between the HOA and the city. These approaches can include deed restrictions or other protections that run with the land in perpetuity and ensure it is maintained and preserved as open space.

Across the cities represented in this discussion series, we identified four criteria common to ensuring public access to a privately managed space:

1. Signage explicitly states that the park is open to the public as well as the park's operating hours and who is responsible for managing the park. The park entrance and signage should be clearly visible from a public right-of-way. In instances where the park entrance is not directly adjacent to a public right-of-way, such as on the rooftop of a building or behind a gated community, there needs to be explicit signage and wayfinding to direct people to the park.
2. The park is listed in a public list or map of publicly accessible parks that is actively maintained by a city staff member and promoted to the public as listing public places to visit and spend time in (e.g., a city website).
3. The park also meets the same basic maintenance requirements, usage types, and operating hours as other public parks in the city.
4. The park has permanent legal protection to remain a publicly accessible park via an easement or other policy mechanism.

As a potential path forward for alternatively managed parks, some cities are contemplating the establishment of a public spaces program staffed by dedicated personnel to oversee the network of publicly accessible sites managed by various entities alongside the city's public park system. For example, New York City has recently established a cabinet-level position responsible for overseeing the coordinated development and operation of public spaces. This role focuses on initiatives such as boulevard redevelopment, outdoor dining programs, and revitalizing closed spaces under public bridges. Similar positions, such as a director of the public realm, have been created in other major cities including Boston, Massachusetts, indicating a growing trend toward prioritizing and enhancing public-private partnerships for parks and open spaces.

## Key Considerations from Community of Practice Participants

The following are key suggestions from CoP participants for cities to consider when developing alternative management approaches to public space without undermining a city's commitment to publicly accessible green space.

**1. Consider alternative management partners, such as special districts, BIDs, or HOAs, that can increase the overall pool of park funding.**

**2. Consider developing a program to oversee publicly accessible but privately managed parks for both residential and commercial areas, with a strong emphasis on maintaining public access as a core value.**

- a. Assigning a dedicated staff member with enforcement authority ensures effective management of the city's private park inventory and supports consistent public access and wayfinding.
- b. The program should establish clear and predictable design standards and use appropriate development incentives as a tool to build partnerships with management entities.

**3. Consider requiring alternatively managed parks to meet the following criteria for ensuring public access:**

- a. Welcoming signage visible from a public right-of-way.
- b. Listing on a city website of publicly accessible parks across the city.
- c. Compliance with maintenance and access standards in place at city parks.
- d. Permanent legal protection to remain a publicly accessible park and protection of the park from future development through an easement or other policy mechanism, including a requirement that the park be replaced if the site is redeveloped.



# Conclusion and Call for Future Research



© JUSTIN BARTELS

**L**and and development policy is an essential tool for city leaders and park practitioners to keep park creation on pace as cities grow. As cities build park systems for the 21st century, there is a growing array of public-private development and management models for public parks. Both regulatory tools and partnerships with the development community are becoming more commonplace and, combined, are contributing significantly to new park creation. Among a sample of large U.S. cities, only 5 percent of park openings in the past five years were on land acquired via outright city purchases; more than half involved land acquired through development policy or dedication. Seventy-five percent of CoP participants shared that they either agree or strongly agree that developers play an essential role in how cities are acquiring land and building new parks.

There is a significant opportunity for cities to implement and optimize park dedication ordinances (PDOs) and impact fees to build park equity: by making sure that park investment keeps pace with population growth, by building flexibility into their policies to allow for PDOs and impact fees to address citywide park utilization, and by ensuring privately owned or managed parks promote public access and system-wide investment. PDOs and impact fees are a growing trend across the country, but more cities need to explore and adopt these policies. Cities that already have land development policies in place can use this report to expand and enhance their regulations to advance equity. Cities without a policy in place can use this as a starting point for building equitable land development policies.

City leaders, researchers, and private-sector developers must work together to define the best way to structure these development policies to advance park equity. Leaders, policymakers, advocates, and practitioners need to be equipped with the knowledge and tools to ensure that a city's land development policies advance its overall park equity goals. There is no one-size-fits-all solution.

As we look toward the future, further research is needed to explore the nuances and potential impacts of these policies so that they can be adapted and optimized to meet the diverse needs of each community. Over the course of developing this report, six types of studies emerged as the most promising next steps for researchers and local leaders interested in advancing their city's PDOs and impact fees:

- **Updating fee and dedication formulas:** Evaluate how cities can modernize local fee and dedication formulas to reflect current land acquisition and park development costs, particularly in cities undergoing significant urban infill development to meet housing needs. In particular, analyze how formulas historically designed for subdivisions can be updated to reflect dense urban development while ensuring compliance with legal standards and balancing stakeholder interests.
- **Refining nexus requirements for equitable park access:** Examine whether refining nexus requirements and introducing flexibility in land dedication and fee structures can improve equitable park access, while also assessing potential unintended consequences such as gentrification and displacement. Consider legal precedents for refining nexus requirements.
- **Restructuring local agency responsibilities for park creation:** Explore innovative ways cities are structuring parks and planning departments to maximize the benefits of development policies in creating essential park infrastructure that promotes health, safety, and well-being.
- **Tracking the impact of development policies on park equity:** Investigate the creation of effective tracking processes and systems to measure how development policies influence park equity. Many cities lack basic data on parks created through development policies, hindering their ability to assess progress toward equity goals.
- **Fostering public-private partnerships for park development:** Assess how public-private partnerships and alternative management structures for park development can ensure public access while promoting equity. Analyze financial models, long-term funding of park maintenance and operations, and policy mechanisms to prioritize public access and equitable outcomes in such partnerships.
- **Addressing developer challenges and exploring incentives:** Investigate financial, logistical, and regulatory challenges developers face in meeting park dedication and fee requirements. Explore incentives and strategies to align developer contributions with city equity goals.

Parks address many of today's most pressing issues, serving as unique resources where a wide array of stakeholders and government officials can unite to enhance public health, climate resilience, community cohesion, and equity. It is essential that cities continue to explore innovative and creative ways to leverage land use policy for parks and green spaces to build thriving, vibrant communities for all.



# Further Reading

Crompton, J. L., & Ellis, G. D. (2020). Is a decline in park provisions inevitable in fast-growth cities? Evidence from Texas. *Journal of Park and Recreation Administration*, 40(2). <https://js.sagamorepub.com/index.php/jpra/article/view/10618>

Crompton, J. L. (2010, October). *Parkland dedication ordinances in Texas: A missed opportunity?* Texas A&M AgriLife Extension. <http://college.agrilife.org/rptsweb/wp-content/uploads/sites/21/2015/05/Parkland-Dedication-Ordinances-in-Texas-A-Missed-Opportunity.pdf>

Crompton, J. L. (2022, February). *Parkland dedication: Optimizing an underutilized resource*. Texas A&M AgriLife Extension. <https://cdn-de.agrilife.org/extension/departments/repk/repk-pu-009/files/parkland-dedication-optimizing-an-underutilized-resource.pdf>

Harnik, P., & Yaffe, L. (2005). *Who's going to pay for this park?* Trust for Public Land. [https://www.tpl.org/wp-content/uploads/2013/12/ccpe\\_who\\_is\\_going\\_to\\_pay.pdf](https://www.tpl.org/wp-content/uploads/2013/12/ccpe_who_is_going_to_pay.pdf)

Nelson, A. C., Nicholas, J. C., Juergensmeyer, J. C., & Mullen, C. (2022). *Proportionate share impact fees and development mitigation*. Routledge.

Rigolon, A., Giamarino, C., & Christensen, J. (2023). Development fees and park equity in Los Angeles. *Journal of the American Planning Association*, 90(2), 230–246. <https://www.tandfonline.com/doi/abs/10.1080/01944363.2023.2201279>

Urban Land Institute. (2018). *The case for open space: Why the real estate industry should invest in parks and open space*. [https://americas.uli.org/wp-content/uploads/ULI-Documents/ULI-Case-For-Open-Space\\_Electronic.pdf](https://americas.uli.org/wp-content/uploads/ULI-Documents/ULI-Case-For-Open-Space_Electronic.pdf)

# Appendices



© CHRIS BENNETT

# Appendix A:

## Full Methodology

The common patterns and emerging practices identified in this report reflect the perspectives of city parks and planning staff from large, growing U.S. cities. Specifically, the findings in this report are derived from three key sources.

**Community of Practice:** Trust for Public Land convened 65 parks and planning practitioners from 37 cities to discuss the role of land use policy, development policy, and partnerships with developers in shaping local park systems. Conversations took place during 2022–23, as part of a “Parks and Development Policy” track of the 10-Minute Walk® Community of Practice (CoP), a learning and peer-networking program.

**Development Policy Review:** TPL reviewed the land development policies of 20 cities across the country to identify common patterns and emerging practices and to examine the relationship between these policies and the acquisition and development of parks and green space. As part of this review, TPL researchers conducted phone and email interviews with parks and planning staff to assess the strengths and limitations of these policies in their cities.

**Park Openings and Acquisitions Analysis:** TPL analyzed recent park openings and acquisitions in 10 cities across the U.S. to determine the sources of funding for new land acquisition and park development. Data for this analysis was collected from city staff in each of the 10 cities. Additionally, TPL used its City Park Facts dataset to compare system-wide acreage trends over time across the 100 most populous cities.

## Community of Practice

The Community of Practice (CoP) is convened annually by Trust for Public Land’s 10-Minute Walk® program to facilitate discussion among park and planning staff about key issues related to park equity. The 2022–23 cycle included a “Parks and Development Policy” track, in which parks and planning staff from 37 cities discussed how land use policy, development policy, and partnerships with developers shape their local park systems. Five virtual sessions were held between November 2022 and June 2023. Each session was 90 minutes long, with a 45-minute “plenary” presentation followed by 45 minutes of facilitated small-group discussion. TPL invited staff from each of the 100 most populous cities included in the Trust for Public Land ParkScore® Index as well as any city that had formally signed on to the 10-Minute Walk program. TPL facilitators identified themes from each of the discussions, which informed the three key questions identified in this report as well as the most salient recommendations for cities to consider.

The 37 cities in the discussion series represent more than 33 million people, or about 10 percent of the U.S. population. Thirty-two of the 37 cities were among the 100 most populous cities in the country in 2022 (population over 215,000). They represent a range of city densities: 14 of the 37 cities are high density, with more than 10 people per acre; three cities have 7–10 people per acre; 15 cities are medium-low density, with 4–7 people per acre; five cities have fewer than four people per acre. The cities represent a range of growth between 2000 and 2022, with seven cities experiencing population decline since 2000, 16 cities experiencing 1–25 percent population growth since 2000, and 14 experiencing more than 25 percent population growth since 2000. (See [Table A.1.](#))

# Development Policy Review

All participants in the discussion series were invited to participate in the analysis of their development policies. This analysis is available in [Appendix B](#). Additional cities with strong park development policies were identified from CoP small-group discussions and asked to participate in the analysis. Twenty cities provided data for the analysis of their park dedication ordinances, park impact fees, or both; 15 of the 20 were participants in the CoP. Columbus, Ohio; Madison, Wisconsin; Oklahoma City, Oklahoma; Portland, Oregon; and St. Paul, Minnesota, also participated in the policy analysis but were not part of the discussion series. Compared with both the CoP participant cities and cities writ large, these 20 cities skewed toward lower densities (65 percent were lower density, compared with a roughly 50–50 split among CoP participants) and higher growth rates (only one was experiencing negative growth), both of which are associated with the need for subdivision development policies. For this reason, the findings of the policy analysis are more representative of cities with park dedication ordinances or impact fees than cities at large. Fifteen of the cities had a park dedication ordinance or impact fee. The other five did not have a formal policy, but did describe how the goal of providing enough park infrastructure for new developments was incorporated into their city’s development review process.

The policy analysis was conducted in a three-step process. First, a set of key policy components and implementation considerations were identified via the discussion series (see main report, [Table 1.1](#)). The key policy components identified were development type, land dedication (i.e., land transfer), land acquisition fee, land improvement fee (park development fee), calculation of the land and fee (rough proportionality), geographic restrictions (essential nexus), credits, exemptions and reductions, alternative compliance, and quality and access requirements. The implementation considerations identified were fee usage, development review process, administrative complexity, and timing considerations.

Second, TPL staff reviewed the text of each city’s relevant development policies and classified each of the policy components. For example, the nexus component of each policy was classified based on whether it was zonal or distance-based. The results of these classifications are presented in [Appendix B](#). Third, TPL staff conducted structured interviews with planning staff responsible for each city’s development policy. These interviews were conducted both to confirm the assessment of the text analysis and to understand how the policies were currently being implemented in practice. For example, some cities allowed for either land dedication or fee-in-lieu, but in practice they only asked for fees or in some cases waived the requirements entirely. These interviews, in particular, informed the analysis of the implementation considerations.

## Park Openings and Acquisitions Analysis

All participants in the CoP were invited to participate in the analysis of their park openings and land acquisitions from 2018 to 2023. Additional cities with high-quality park opening data were identified from TPL relationships and asked to participate in the analysis. Ten cities provided data for the analysis of their park openings, land acquisitions, or both, and eight of the 10 were participants in the CoP (Columbus, Ohio, and Portland, Oregon, were not).

These 10 cities are representative of the range of city densities, with an even split between low- and high-density cities. The cities did, however, skew toward larger and high-growth cities, with all but two of the 10 experiencing greater than 23 percent population growth between 2000 and 2022 (Cleveland and Long Beach being the exceptions). All but one were at least 300,000 in population as of 2022 (Lewisville, Texas, was the exception at 131,215). Cities from across the U.S. geography were included, with the exception of the Southeast.



Cities were asked to provide an Excel file with a list of all park openings and all park or open space land acquisitions from 2018 to 2023. A total of 76 agency park openings and 98 undeveloped acquisitions were provided across the 10 cities during this period. Four cities also provided data on publicly accessible but privately managed park openings in that same period, for an additional 35 privately managed but publicly accessible park openings. City staff provided additional data on both openings and acquisitions: specifically, the year opened or acquired, how the site was acquired (e.g., via developer dedication), and who was responsible for the site's park development (e.g., agency or developer). These inventories were reviewed by TPL and confirmed via interviews with relevant city staff. Results from this analysis are available in [Appendix C](#).

**Table A.1. Summary of City Inclusion in Different Components of Study**

City	City Characteristics			City Staff Participation		
	2022 City Population	2022 City Density	Pop. Growth Since 2000	Community of Practice	Policy Review	Park Creation Analysis
Anaheim, CA	346,023	High	6%	X		
Arlington, TX	399,679	Medium-Low	20%	X	X	
Aurora, CO	398,994	Low	45%	X	X	X
Austin, TX	1,003,496	Medium-Low	53%	X	X	
Baltimore, MD	576,870	High	-11%	X		
Baton Rouge, LA	227,473	Medium-Low	0%	X		
Boston, MA	685,476	High	16%	X		
Bridgeport, CT	148,654	High	7%	X		
Buffalo, NY	279,145	High	-5%	X		
Charlotte/Mecklenburg, NC	1,164,981	Low	68%	X	X	
Cleveland, OH	371,562	Medium-High	-22%	X	X	X
Colorado Springs, CO	495,511	Medium-Low	37%	X		
Columbus, OH	927,811	Medium-Low	30%		X	X
Dallas, TX	1,320,535	Medium-Low	11%	X		
Denver, CO	744,729	High	34%	X	X	X
Des Moines, IA	218,206	Medium-Low	10%	X	X	
Elizabeth, NJ	135,407	High	12%	X		
Fort Worth, TX	966,549	Medium-Low	81%	X	X	
Grand Blanc, MI	7,960	Low	-3%	X		
Houston, TX	2,355,890	Medium-Low	21%	X		
Irvine, CA	319,103	Medium-High	123%	X		X

	City Characteristics			City Staff Participation		
City	2022 City Population	2022 City Density	Pop. Growth Since 2000	Community of Practice	Policy Review	Park Creation Analysis
Lewisville, TX	131,215	Medium-Low	68%	X	X	X
Lexington/Fayette, KY	327,130	Low	26%	X		X
Lincoln, NE	297,371	Medium-Low	32%	X	X	
Long Beach, CA	464,125	High	1%	X	X	X
Los Angeles, CA	3,903,648	High	6%	X	X	
Madison, WI	277,146	Medium-Low	34%		X	
Minneapolis, MN	439,124	High	15%	X		
New Orleans, LA	388,624	Low	-20%	X		
New York, NY	8,840,134	High	10%	X		
Oakland, CA	446,649	High	12%	X		
Oklahoma City, OK	702,619	Low	39%		X	
Phoenix, AZ	1,647,147	Medium-Low	25%	X		
Plano, TX	291,554	Medium-Low	31%	X		
Portland, OR	665,438	Medium-High	26%		X	X
Raleigh, NC	480,766	Medium-Low	74%	X	X	
Sacramento, CA	534,959	Medium-High	31%	X		
San Antonio, TX	1,453,138	Medium-Low	27%	X		
San Francisco, CA	883,822	High	14%	X		
St. Paul, MN	314,825	Medium-High	10%		X	
Scranton, PA	75,848	Medium-Low	-1%	X		
Washington, DC	706,367	High	23%	X	X	X

City density groups are classified by the following:

Low: <4 people per acre land area

Medium-Low: 4-7

Medium-High: 7-10

High: 10+



# Appendix B

## Policy Review and Summary

This appendix provides a synopsis of the land development policies in 20 cities reviewed for this report, focusing on park dedication ordinances and impact fees that support park creation. The analysis is limited, as each city may have additional relevant policies beyond those included here. This snapshot is intended to highlight the specific policies examined. Five of the 20 cities—Cleveland, Ohio; Denver, Colorado; Des Moines, Iowa; Lexington, Kentucky; and Charlotte, North Carolina—did not have applicable park dedication ordinances or impact fees and are therefore not included in this appendix.

DEDICATION WITH DISTANCE NEXUS					
	Aurora, CO	Austin, TX	Fort Worth, TX	Los Angeles, CA	St. Paul, MN
<b>What policies does the city have?</b>					
Policy reviewed*	Dedication ordinance	Dedication ordinance	Dedication ordinance	Dedication ordinance	Dedication ordinance
Link to city ordinance	<a href="https://tinyurl.com/5ae3s7jr">https://tinyurl.com/5ae3s7jr</a>	<a href="https://tinyurl.com/4hk2r94c">https://tinyurl.com/4hk2r94c</a>	<a href="https://tinyurl.com/3mw9tukn">https://tinyurl.com/3mw9tukn</a>	<a href="https://tinyurl.com/yw9h9p3k">https://tinyurl.com/yw9h9p3k</a>	<a href="https://tinyurl.com/4tcak3e9">https://tinyurl.com/4tcak3e9</a>
Link to additional city background	<a href="https://tinyurl.com/5n6dmwnz">https://tinyurl.com/5n6dmwnz</a>	<a href="https://tinyurl.com/yu2fn2sv">https://tinyurl.com/yu2fn2sv</a>	<a href="https://tinyurl.com/28redr9h">https://tinyurl.com/28redr9h</a>	<a href="https://tinyurl.com/mr4yvke8">https://tinyurl.com/mr4yvke8</a>	<a href="https://tinyurl.com/z5umea58">https://tinyurl.com/z5umea58</a>
Applicable land type reviewed**	Residential, single-family	Residential, single-family	Residential, single-family	Residential	Residential, multi-family*
Option for land dedication	Yes	Yes	Yes	Yes	Yes
Option for developer-built park	Yes	Yes	Yes	Yes	Yes
Option for land acquisition/fee-in-lieu/impact fee	Yes	Yes	Yes	Yes	Yes
Option for land improvement fee	Yes	Yes	Yes	No	No
Options for credits or exemptions	Yes	Yes	Yes	Yes	Yes
<b>How does the city approach nexus?</b>					
Approach	Distance	Distance	Distance	Distance	Distance
Number of zones (if using zone-based approach)	N/A*	N/A*	N/A	N/A*	N/A
<b>What requirements does the city have for dedicated land?</b>					
Floodplain requirements	Yes	Yes	Yes	Yes**	No
Slope requirements	Yes	Yes	Yes	Yes**	No
Size requirements	Yes	Yes	Yes	Yes**	No
Location requirements	No	Yes	Yes	Yes**	No

	Aurora, CO	Austin, TX	Fort Worth, TX	Los Angeles, CA	St. Paul, MN
<b>What formula does the city use for calculating land donation requirements?</b>					
Formula	3.0 acres per 1,000 for neighborhood parks 1.1 acres per 1,000 for community parks 7.8 acres per 1,000 residents for open space	9.4 acres per 1,000 residents and functional population	3.25 acres x dwelling units x persons/unit for neighborhood; 3.75 acres for community	LD = (DU x P) x F LD: Land to be dedicated in acres. DU: Total number of new market-rate dwelling units. P: Average number of people per occupied dwelling unit as determined by the most recent version of the U.S. Census for the City of Los Angeles. F: Park service factor, as indicated by the Department of Recreation and Parks rate and fee schedule.	Residential: 150 square feet per new dwelling unit with a maximum of 4.5% of the parcel's buildable land.
<b>How does the city construct its fee-in-lieu, acquisition, or impact fee?</b>					
Fee basis	Fair market value (FMV) of site*	Other**	FMV of site	Constant value, city (not tied to FMV assessment)	FMV of site
Frequency of updates to formula	Annual—e.g., tied to annual FMV assessment/Construction Cost Index/inflation	Annual—e.g., tied to annual FMV assessment/Construction Cost Index/inflation	Annual—e.g., tied to annual FMV assessment/Construction Cost Index/inflation	Annual—e.g., tied to annual FMV assessment/Construction Cost Index/ inflation	Not regularly or not applicable
How can the fee be used	Acquisition only	Acquisition or park development	Acquisition or park development	Acquisition or park development	Acquisition or park development
Nexus—where can fees be spent	Within short distance of site (< 1 mile)**	Within short distance of site (< 1 mile)***	Within short distance of site (< 1 mile)*	Other	Within short distance of site (< 1 mile)**
<b>How does the city construct its improvement fee?</b>					
Fee type	Development fee that supplements dedication requirement	Development fee that supplements dedication requirement	Development fee that supplements dedication requirement	No fee present	No fee present
Formula basis	Tied to development cost index (e.g., Construction Cost Index)	Other****	Tied to development cost index (e.g., Construction Cost Index)	N/A	N/A
Frequency of updates to formula	Annual—e.g., tied to annual index/ inflation	Annual—e.g., tied to annual index/ inflation	Annual—e.g., tied to annual index/ inflation	N/A	N/A
Nexus—where can fees be spent	Within short distance of site (< 1 mile)	Within short distance of site (< 1 mile)***	Within short distance of site (< 1 mile)	N/A	N/A
Usage of fees	Park development only	Dedication or park development	Dedication or park development	N/A	N/A
<b>What credits and exemptions are available?</b>					
Affordable or senior housing	Yes	Yes	No	Yes	Yes
Providing private park	No	Yes	Yes	Yes	Yes
Stormwater	No	Yes	No	No	No
Other	Reductions allowed for infill and transit-oriented development	Yes	No	Improvements to city-owned land and “land-in-lieu of fee”	N/A

	Aurora, CO	Austin, TX	Fort Worth, TX	Los Angeles, CA	St. Paul, MN
<p>* Other land dedication policies or requirements may exist within the city.</p> <p>** Policy may apply to multiple or additional land types with varying requirements based on land type.</p>	<p>* Unless development qualifies as infill, in which case the "infill incentive rate" applies.</p> <p>** Fees from Transit-Oriented Development (TOD) sites can be spent anywhere, as can open space fees.</p>	<p>* Austin uses a distance-based approach for its nexus that prioritizes that the PDO requirement be met within a half-mile of the development where possible. If a half-mile isn't possible, the city allows for the requirement to be met within 2 miles. If 2 miles isn't possible, the requirement can be met within the cities park planning area (of which there are 27).</p> <p>** Five-year average of purchasing parkland across the city.</p> <p>*** Ranked priority of ½-mile, 2-miles, and park planning area.</p> <p>**** Tied to average development cost for new parks.</p>	<p>If land is not available within the neighborhood unit, the city may spend within an adjacent neighborhood unit. If no opportunities are available in the adjacent neighborhood unit, then areas within the community park unit or park planning district may be considered.</p>	<p>* Fee payments must be within 2, 5, or 10 miles of the development based on the classification of the park receiving the Park Fees. The three park classifications are Neighborhood (2), Community (5), and Regional (10).</p> <p>** At discretion of Recreation and Parks.</p>	<p>* Also applies to mixed-use, commercial, industrial and warehousing/storage, with different requirements for each land type.</p> <p>** Fees must be spent within 0.5 miles.</p>

## DEDICATION WITH ZONES OR CITYWIDE NEXUS

	Arlington, TX	Colorado Springs, CO	Columbus, OH	Lewisville, TX	Madison, WI
<b>What policies does the city have?</b>					
Policy reviewed*	Dedication ordinance	Dedication ordinance	Dedication ordinance	Dedication ordinance	Dedication ordinance
Link to city ordinance	<a href="https://tinyurl.com/mrhbasj7">https://tinyurl.com/mrhbasj7</a>	<a href="https://tinyurl.com/v9bykm5x">https://tinyurl.com/v9bykm5x</a>	<a href="https://tinyurl.com/4fv5fvm3">https://tinyurl.com/4fv5fvm3</a>	<a href="https://tinyurl.com/yc3jdb96">https://tinyurl.com/yc3jdb96</a>	<a href="https://tinyurl.com/yc3jdb96">https://tinyurl.com/yc3jdb96</a>
Link to additional city background		<a href="https://tinyurl.com/38f9u2fb">https://tinyurl.com/38f9u2fb</a>		<a href="https://tinyurl.com/3vfht3t8">https://tinyurl.com/3vfht3t8</a>	<a href="https://tinyurl.com/3vfht3t8">https://tinyurl.com/3vfht3t8</a>
Applicable land type reviewed**	Residential	All residential	Other	Residential, multi-family	Residential, single-family
Option for land dedication	Yes	Yes	Yes	Yes	Yes
Option for developer-built park	Yes	Yes	Yes	Yes	Yes
Option for land acquisition/fee-in-lieu/impact fee	Yes	Yes	Yes	Yes	Yes
Option for land improvement fee	No	No	No	Yes	Yes
Options for credits or exemptions	Yes	Yes	Yes	No	Yes
<b>How does the city approach nexus?</b>					
Approach	Zones	Zones	Zones	Citywide	Zones
Number of zones (if using zone-based approach)	12	8	6	1	5
<b>What requirements does the city have for dedicated land?</b>					
Floodplain requirements	No	No*	No*	No	Yes
Slope requirements	No	No*	No**	No	Yes
Size requirements	No	Yes	No***	No	Yes
Location requirements	No	Yes	No****	No	Yes

	Arlington, TX	Colorado Springs, CO	Columbus, OH	Lewisville, TX	Madison, WI
<b>What formula does the city use for calculating land donation requirements?</b>					
Formula	N/A	# of units x acres of dedication per unit = land dedication requirement acres (Overall: 5.5 acres/1,000 people)	# of proposed dwelling units x median household size for owner-occupied residents/1,000 x 5.5 acres	Ratio of 3 acres for each 100 dwelling units; for those with less than 100 dwelling units, each dwelling unit shall equal .03 acres	1,081 square feet per unit
<b>How does the city construct its fee-in-lieu, acquisition, or impact fee?</b>					
Fee basis	Fair market value (FMV) of site	Average FMV of city	Average FMV of city	Constant value, city (not tied to FMV assessment)	Average FMV of city
Frequency of updates to formula	Annual—e.g., tied to annual FMV assessment/Construction Cost Index/inflation	On regular basis—every 1–5 years	On regular basis—every 1–5 years	On regular basis—every 1–5 years	Annual—e.g., tied to annual FMV assessment/Construction Cost Index/inflation
How can the fee be used	Acquisition or park development	Acquisition only	Acquisition or park development	Acquisition or park development	Acquisition or park development
Nexus—where can fees be spent	Anywhere in city (subject to approval)	Within zone**	Within zone	Anywhere in city (subject to approval)	Within zone
<b>How does the city construct its improvement fee?</b>					
Fee type	No fee present	No fee present	No fee present	Development fee that supplements dedication requirement	Development fee that supplements dedication requirement
Formula basis	N/A	N/A	N/A	Constant value based on one-time study, not indexed	Tied to development cost index (e.g., Construction Cost Index)
Frequency of updates to formula	N/A	N/A	N/A	On regular basis—every 1–5 years	Annual—e.g., tied to annual index/inflation
Nexus—where can fees be spent	N/A	N/A	N/A	Anywhere in city (subject to approval)	Within zone
Usage of fees	N/A	N/A	N/A	Dedication or park development	Park development only
<b>What credits and exemptions are available?</b>					
Affordable or senior housing	No	No	No	No	Yes
Providing private park	No	Yes	Yes	No	Yes
Stormwater	No	No	Yes	No	No
Other	No	<p>There are several “alternative compliance” measures available for developers to meet the dedication requirement. The city must come to terms on these changes with the developer:</p> <ul style="list-style-type: none"> <li>• Development of park by developer with land conveyed to e.g., a district (an alternative owner and management entity)</li> <li>• Creation of multi-use trail when it aligns with the Park System Master Plan (PSMP).</li> <li>• Dedication of open space must align with department objectives</li> <li>• Alternative parks (e.g., mini-park, plaza, special purpose park) if they support 5.5 acres/1,000 people.</li> <li>• Improvements to existing park facilities (should align with PSMP, Capital Improvements Program lists, or other recognized needs)</li> </ul>	Credits can be provided for improvements made to dedicated land	No	No

	Arlington, TX	Colorado Springs, CO	Columbus, OH	Lewisville, TX	Madison, WI
<ul style="list-style-type: none"> <li>* Other land dedication policies or requirements may exist within the city.</li> <li>** Policy may apply to multiple or additional land types with varying requirements based on land type.</li> </ul>		<ul style="list-style-type: none"> <li>* These elements are considered in the evaluation of a site, but there are no specific requirements.</li> <li>** Or an adjacent zone.</li> </ul>	<ul style="list-style-type: none"> <li>* Floodplain land within parkland can be accepted for land donated as part of Floodplain land within park boundary accepted for PDO</li> <li>** Riparian and ravine land within parkland can be accepted for land donated as part of Riparian and ravine land within park boundary accepted for PDO.</li> <li>*** Five acres is preferred, but will accept smaller sizes depending on neighborhood and existing park adjacency.</li> <li>**** Prefers parcels adjacent to existing parkland and requires road frontage.</li> </ul>		

## IMPACT FEES

	Lincoln, NE	Long Beach, CA	Oklahoma City, OK	Portland, OR	Raleigh, NC
<b>What policies does the city have?</b>					
Policy reviewed*	Impact fee	Impact fee	Impact fee	Impact fee	Impact fee
Link to city ordinance	<a href="https://tinyurl.com/3kndu5p9">https://tinyurl.com/3kndu5p9</a>	<a href="https://tinyurl.com/mwn6yfuu">https://tinyurl.com/mwn6yfuu</a>	<a href="https://tinyurl.com/4np3z3me">https://tinyurl.com/4np3z3me</a>		<a href="https://tinyurl.com/24fauf3v">https://tinyurl.com/24fauf3v</a>
Link to additional city background	<a href="https://tinyurl.com/y966psxz">https://tinyurl.com/y966psxz</a>		<a href="https://tinyurl.com/ms53eurrr">https://tinyurl.com/ms53eurrr</a>	<a href="https://tinyurl.com/mryxhkww">https://tinyurl.com/mryxhkww</a>	<a href="https://tinyurl.com/444bzysj">https://tinyurl.com/444bzysj</a>
Applicable land type reviewed**	Residential, multi-family	Residential, multi-family	Residential, multi-family	Other	Residential, multi-family
Option for land dedication	No	No	No	No	No
Option for developer-built park	No	No	Yes	No	No
Option for land acquisition/fee-in-lieu/impact fee	Yes	Yes	Yes	Yes	Yes
Option for land improvement fee	No	Yes	Yes	Yes	Yes
Options for credits or exemptions	Yes	Yes	Yes	Yes	No
<b>How does the city approach nexus?</b>					
Approach	Zones	Citywide	Zones	Zones	Zones
Number of zones (if using zone-based approach)	7	1	5	2	4
<b>What requirements does the city have for dedicated land?</b>					
Floodplain requirements	No	No	No	No	No
Slope requirements	No	No	No	No	No
Size requirements	No	No	No*	No	No*
Location requirements	No	No	No	No	No**

	Lincoln, NE	Long Beach, CA	Oklahoma City, OK	Portland, OR	Raleigh, NC
<b>What formula does the city use for calculating land donation requirements?</b>					
Formula	N/A	N/A	N/A	N/A	N/A
<b>How does the city construct its fee-in-lieu, acquisition, or impact fee?</b>					
Fee basis	Constant value, city (not tied to fair market value [FMV] assessment)	Tied to development cost index (e.g., Construction Cost Index)	Constant value, city (not tied to FMV assessment)	Other*	Average FMV of zone
Frequency of updates to formula	On regular basis—every 1–5 years	Not regularly or not applicable	Annual—e.g., tied to annual FMV assessment/Construction Cost Index/inflation	Annual—e.g., tied to annual FMV assessment/Construction Cost Index/inflation	Annual—e.g., tied to annual FMV assessment/Construction Cost Index/inflation
How can the fee be used	Acquisition or park development	Acquisition or park development	Acquisition or park development	Acquisition or park development	Acquisition or park development
Nexus—where can fees be spent	Within zone	Anywhere in the city, subject to approval	Within zone	Within zone	Within zone
<b>How does the city construct its improvement fee?</b>					
Fee type	No fee present	Impact fee that can fund acquisition or improvements	Impact fee that can fund acquisition or improvements	Impact fee that can fund acquisition or improvements	Impact fee that can fund acquisition or improvements
Formula basis	N/A	N/A	N/A	N/A	N/A
Frequency of updates to formula	N/A	N/A	N/A	N/A	N/A
Nexus—where can fees be spent	N/A	N/A	N/A	N/A	N/A
Usage of fees	N/A	N/A	N/A	N/A	N/A
<b>What credits and exemptions are available?</b>					
Affordable or senior housing	Low and moderate income housing	Yes	No	Yes	No
Providing private park	No	No	Yes	No	No
Stormwater	No	No	No	No	No
Other	No	No	N/A	No	No
* Other land dedication policies or requirements may exist within the city. ** Policy may apply to multiple or additional land types with varying requirements based on land type.			* 3.5% of the gross area of the plat must be parkland.	* Based on replacement value per person.	* There are requirements for the size of greenway easements that are dedicated. ** Greenway easement dedication is required from residential development along specific corridors.



# Appendix C

## Park Openings and Acquisitions Analysis

TPL researchers collected park opening and acquisition data between 2018 and 2023 from staff in 10 U.S. cities to document the prevalence of development policy in shaping park acquisition and development across the country. Additional information on the methodology can be found in [Appendix A](#).

### Publicly Accessible Park Openings and Acquisitions Across 10 Cities, 2018–23

From 2018 to 2023, the parks and recreation agencies in the 10 cities opened 76 parks and acquired an additional 98 undeveloped sites for a total of 174 acquisitions in this analysis (Table C.1). Additionally, four of the 10 cities were able to provide data on publicly accessible park openings managed by a private or quasi-public entity. Across these four cities, private entities were responsible for opening an additional 35 parks in this time period, bringing those cities' total park openings to 48. The parks opened by private entities comprised 73 percent of these 48 openings.

**Table C.1. Publicly Accessible Park Openings and Acquisitions Across 10 Cities, 2018–23**

City	State	City Park and Recreation Agency Acquisitions and Openings			Public and Private Park and Greenway Openings		
		Openings, Agency-Managed	Undeveloped Agency Acquisitions	Total Openings/ Acquisitions	Openings, Privately Managed	Total Openings	Of Openings, % Privately Managed
Aurora	CO	2	13	15	No data		
Cleveland	OH	3	—	3	4	7	57%
Columbus	OH		40	40	No data		
Denver	CO	27	18	45	No data		
Irvine	CA	2	NA	2	20	22	91%
Lewisville	TX	28	20	48	No data		
Lexington	KY	3	3	6	No data		
Long Beach	CA	3	NA	3	2	5	40%
Portland	OR	3	4	7	No data		
Washington, DC	DC	5	NA	5	9	14	64%
Total		76	98	174	35	48	73%
% of Total		44%	56%	100%			

### Acquisition and Development Methods for the 76 Parks and Recreation Agency Park and Greenway Openings, 2018–23

Of the 76 city-managed park openings from 2018 to 2023, 67 percent were constructed on a site acquired via dedication or development fees. The remainder were constructed on sites acquired through direct city purchase (5 percent), interagency transfer (13 percent), or other methods (14 percent). The acquisition year for these 76 city-managed park openings could have been earlier than 2018—city staff did not readily have acquisition years for many of these openings (Table C.2).

A similar picture emerged from analysis of the entities responsible for construction of the parks. Sixty-two percent of the parks were constructed by the developer or a private entity before being transferred to the city. Thirty-seven percent were constructed by the city or another public agency (Table C.2).

**Table C.2. Acquisition and Development Methods for the 76 Parks and Recreation Agency Park and Greenway Openings, 2018–23**

City	State	Openings	Land Acquisition Mechanism				Entity Responsible for Park Development		
		Total	Via Dedication or Development fees	City Purchase	Interagency Transfer	Other	Developer or Private	City or Public	Other
Aurora	CO	2	1	1				2	
Cleveland	OH	3	2	1			1	2	
Columbus	OH	—							
Denver	CO	27	16		5	6	16	10	1
Irvine	CA	2	2				2	—	
Lewisville	TX	28	24	1	3		23	5	
Lexington	KY	3	—	—	1	2	1	2	
Long Beach	CA	3	—	1	1	1	1	2	
Portland	OR	3	3	—	—	—	—	3	—
Washington, DC	DC	5	3	—		2	3	2	
<b>Total</b>		<b>76</b>	<b>51</b>	<b>4</b>	<b>10</b>	<b>11</b>	<b>47</b>	<b>28</b>	<b>1</b>
<b>% of Total</b>		<b>100%</b>	<b>67%</b>	<b>5%</b>	<b>13%</b>	<b>15%</b>	<b>62%</b>	<b>37%</b>	<b>1%</b>

## Acquisition Methods for the Combined 174 Openings and Undeveloped Acquisitions, 2018–23

This analysis presents the same acquisition analysis as [Table C.2](#), but for the combined sample of both the 76 openings and 98 undeveloped acquisitions (174 total sites).

Of the 174 sites of either a park opening or site acquisition between 2018 and 2023, 62 percent were acquired via dedication or development fees. The remainder were constructed on sites acquired through direct city purchase (17 percent), interagency transfer (12 percent), or other methods (9 percent).

Two cities acquired sites as part of significant planned developments. In Denver, several sites are in the process of being transferred to the city from the Stapleton development. In Lewisville, the city annexed the Castle Hills development and its many parks. For this reason, we also include a sub-analysis that compares the acquisition methods without Denver and Lewisville. Excluding these two cities, the trend remains similar: 59 percent of sites were acquired via dedication or development fees, 22 percent via city purchase, 7 percent via interagency transfer, and 11 percent via other methods (Table C.3).

**Table C.3. Acquisition Methods for the Combined 174 Openings and Undeveloped Acquisitions, 2018–23**

City	State	Total Acquisitions by Park Development Status			Acquisition Mechanism, Undeveloped and Developed Acquisitions			
		Undeveloped	Developed (Openings)*	Total	Via Dedication or Development Fees	City Purchase	Interagency Transfer	Other
Aurora	CO	13	2	15	14	1	—	—
Cleveland	OH	—	3	3	2	1	—	—
Columbus	OH	40	—	40	20	14	3	3
Denver	CO	18	27	45	22	9	7	7
Irvine	CA	—	2	2	2	—	—	—
Lewisville	TX	20	28	48	38	2	8	—
Lexington	KY	3	3	6	—	1	2	3
Long Beach	CA	—	3	3	—	1	1	1
Portland	OR	4	3	7	7	—	—	—
Washington	DC	—	5	5	3	—	—	2
<b>Total</b>		<b>98</b>	<b>76</b>	<b>174</b>	<b>108</b>	<b>29</b>	<b>21</b>	<b>16</b>
<b>% of Total</b>		<b>56%</b>	<b>44%</b>	<b>100%</b>	<b>62%</b>	<b>17%</b>	<b>12%</b>	<b>9%</b>
<b>Subtotal, Excluding Denver and Lewisville**</b>		<b>60</b>	<b>21</b>	<b>81</b>	<b>48</b>	<b>18</b>	<b>6</b>	<b>9</b>
<b>% of Subtotal</b>		<b>74%</b>	<b>26%</b>	<b>100%</b>	<b>59%</b>	<b>22%</b>	<b>7%</b>	<b>11%</b>

\* Some of the “openings” listed here were for land acquired prior to 2018 but still included in this sample. In other words, this sample includes any land acquired or park opened between 2018 and 2023.

\*\* Denver’s and Lewisville’s openings each include the acquisition of significant planned developments—in Denver’s case, the transfer of parks developed as part of the Stapleton development, and in Lewisville’s case, the annexation of the Castle Hills development, including transfer of parks management to the city. The exclusions of these cities and their large developments do not affect the overall trends seen in the data; thus it is recommended to not exclude them.

## Status of 98 Undeveloped Acquisitions, 2018–23

Of the 98 undeveloped acquisitions, 30 percent are awaiting park construction. City staff reported not anticipating any additional development for the remaining 70 percent of the sites—mostly because they would remain natural areas or open space (e.g., as part of a greenway), and in four cases because they represented expansion of an existing park site (Table C.4).

**TABLE C.4. STATUS OF 98 UNDEVELOPED ACQUISITIONS, 2018–23**

City	State	Total Undeveloped Acquisitions	Of Undeveloped Acquisitions, Why Undeveloped		
			Natural Area or Open Space	Awaiting Development	Expansion of Existing Site
Aurora	CO	13	13		
Cleveland	OH	—			
Columbus	OH	40	21	19	—
Denver	CO	18	10	4	4
Irvine	CA	—			
Lewisville	TX	20	18	2	
Lexington	KY	3		3	
Long Beach	CA	—			
Portland	OR	4	3	1	—
Washington	DC	—			4
<b>Total</b>		<b>98</b>	<b>65</b>	<b>29</b>	<b>4%</b>
<b>% of Total</b>		<b>100%</b>	<b>66%</b>	<b>30%</b>	<b>4%</b>

# Appendix D

## Park Acreage Per Resident Trend Analysis

TPL compared park acreage per resident—a commonly used metric for setting acreage requirements in park dedication ordinances—among the 100 most populous cities between 2016 and 2023 to determine whether city park creation is keeping pace with population growth. For most cities, it is not. Of the 91 cities able to provide data, 58 (64%) have less park acreage per resident in 2023 compared to 2016 (Table D.1).

The data was collected as part of TPL’s annual City Park Facts Survey of the 100 most populous cities. Cities that were not part of the survey in both 2016 and 2023 (e.g., they were not among the 100 most populous cities in both years) were excluded. Cities that experienced significant changes in how they reported park acreage—such as shifting from reporting at the city level to the county level (e.g., Honolulu)—were also excluded. This resulted in a sample of 91 cities.

TPL also adjusted data where applicable to ensure consistency in reporting between 2016 and 2023. For example, significant park acreages were added to some city surveys in subsequent years, so TPL added those acres to the 2016 reported values to better reflect actual park creation trends. Because of these adjustments, the values reported here may not always match the data as originally published, but they represent TPL’s most accurate understanding of the data as of the time of publication.

**Table D.1. Comparison of Park Acreage Per Capita Among the Most Populous U.S. Cities, 2016–23**

City	2016			2023			Change		
	Population	Park Acreage	Park Acreage Per 1,000 Pop.	Population	Park Acreage	Park Acreage Per 1,000 Pop.	Population	Park Acreage	Park Acreage Per 1,000 Pop.
1. Pittsburgh, PA	305,150	2,983	9.8	305,298	4,175	13.7	0%	40%	40%
2. Tucson, AZ	529,346	4,369	8.3	548,705	6,195	11.3	4%	42%	37%
3. Richmond, VA	215,292	2,027	9.4	231,285	2,755	11.9	7%	36%	27%
4. Memphis, TN	653,480	9,145	14.0	631,187	11,163	17.7	-3%	22%	26%
5. Santa Ana, CA	333,189	517	1.6	309,050	600	1.9	-7%	16%	25%
6. Hialeah, FL	227,149	198	0.9	225,489	238	1.1	-1%	20%	21%
7. Louisville, KY	750,667	17,572	23.4	642,889	17,922	27.9	-14%	2%	19%
8. Colorado Springs, CO	437,068	11,031	25.2	495,511	14,785	29.8	13%	34%	18%
9. San Antonio, TX	1,380,401	26,132	18.9	1,453,138	32,001	22.0	5%	22%	16%
10. Buffalo, NY	257,895	1,903	7.4	279,145	2,383	8.5	8%	25%	16%
11. Cleveland, OH	383,389	2,998	7.8	371,562	3,311	8.9	-3%	10%	14%

	2016			2023			Change		
City	Population	Park Acreage	Park Acreage Per 1,000 Pop.	Population	Park Acreage	Park Acreage Per 1,000 Pop.	Population	Park Acreage	Park Acreage Per 1,000 Pop.
12. Jacksonville, FL	845,254	64,603	76.4	978,003	84,324	86.2	16%	31%	13%
13. Cincinnati, OH	300,747	6,891	22.9	311,917	8,057	25.8	4%	17%	13%
14. Baltimore, MD	620,218	4,905	7.9	576,870	5,102	8.8	-7%	4%	12%
15. St. Louis, MO	316,704	3,720	11.7	297,651	3,889	13.1	-6%	5%	11%
16. St. Petersburg, FL	245,960	4,555	18.5	259,920	5,342	20.6	6%	17%	11%
17. Milwaukee, WI	587,561	5,143	8.8	576,366	5,591	9.7	-2%	9%	11%
18. Fremont, CA	222,279	18,816	84.7	235,898	21,957	93.1	6%	17%	10%
19. Chicago, IL	2,737,877	12,588	4.6	2,750,534	13,866	5.0	0%	10%	10%
20. Fresno, CA	510,677	2,931	5.7	547,499	3,429	6.3	7%	17%	9%
21. Columbus, OH	826,587	11,926	14.4	927,811	14,513	15.6	12%	22%	8%
22. Sacramento, CA	477,381	5,561	11.6	534,959	6,747	12.6	12%	21%	8%
23. Riverside, CA	312,090	3,673	11.8	316,692	3,976	12.6	1%	8%	7%
24. Greensboro, NC	278,584	7,578	27.2	303,787	8,795	29.0	9%	16%	6%
25. Miami, FL	426,312	1,442	3.4	455,738	1,639	3.6	7%	14%	6%
26. Glendale, AZ	236,192	1,910	8.1	251,644	2,100	8.3	7%	10%	3%
27. Denver, CO	649,214	5,957	9.2	744,729	7,028	9.4	15%	18%	3%
28. San Francisco, CA	832,330	5,693	6.8	883,822	6,164	7.0	6%	8%	2%
29. Baton Rouge, LA	230,000	1,451	6.3	227,473	1,455	6.4	-1%	0%	1%
30. Scottsdale, AZ	226,562	28,817	127.2	246,001	31,598	128.4	9%	10%	1%
31. Virginia Beach, VA	448,653	24,936	55.6	464,214	25,993	56.0	3%	4%	1%
32. Houston, TX	2,216,413	40,727	18.4	2,355,890	43,486	18.5	6%	7%	0%
33. Anaheim, CA	349,504	4,626	13.2	346,023	4,584	13.2	-1%	-1%	0%
34. Toledo, OH	280,406	3,128	11.2	268,744	2,995	11.1	-4%	-4%	0%
35. El Paso, TX	685,272	30,081	43.9	687,301	30,012	43.7	0%	0%	-1%
36. Anchorage, AK	301,202	914,121	3,034.9	290,509	871,794	3,000.9	-4%	-5%	-1%
37. Long Beach, CA	471,210	3,123	6.6	464,125	3,034	6.5	-2%	-3%	-1%
38. Los Angeles, CA	3,887,115	40,122	10.3	3,903,648	39,626	10.2	0%	-1%	-2%
39. Washington, DC	636,737	8,525	13.4	706,367	9,296	13.2	11%	9%	-2%
40. Madison, WI	240,627	6,358	26.4	277,146	7,145	25.8	15%	12%	-2%
41. Albuquerque, NM	556,866	22,493	40.4	567,242	22,157	39.1	2%	-1%	-3%
42. Winston-Salem, NC	236,833	3,666	15.5	253,749	3,797	15.0	7%	4%	-3%
43. Kansas City, MO	470,312	17,683	37.6	517,971	18,816	36.3	10%	6%	-3%
44. Chesapeake, VA	236,285	56,326	238.4	255,227	58,693	230.0	8%	4%	-4%



	2016			2023			Change		
City	Population	Park Acreage	Park Acreage Per 1,000 Pop.	Population	Park Acreage	Park Acreage Per 1,000 Pop.	Population	Park Acreage	Park Acreage Per 1,000 Pop.
45. Detroit, MI	663,728	5,543	8.4	637,423	5,134	8.1	-4%	-7%	-4%
46. Irvine, CA	232,628	8,325	35.8	319,103	11,008	34.5	37%	32%	-4%
47. Boston, MA	634,253	4,956	7.8	685,476	5,160	7.5	8%	4%	-4%
48. Stockton, CA	299,775	1,157	3.9	323,593	1,199	3.7	8%	4%	-4%
49. New York, NY	8,433,086	39,615	4.7	8,840,134	39,796	4.5	5%	0%	-4%
50. Philadelphia, PA	1,551,773	10,830	7.0	1,619,078	10,797	6.7	4%	0%	-4%
51. Phoenix, AZ	1,513,274	49,254	32.5	1,647,147	51,020	31.0	9%	4%	-5%
52. Lincoln, NE	270,141	3,650	13.5	297,371	3,808	12.8	10%	4%	-5%
53. Garland, TX	235,705	2,922	12.4	251,478	2,951	11.7	7%	1%	-5%
54. Atlanta, GA	439,696	4,990	11.3	515,426	5,530	10.7	17%	11%	-5%
55. Lexington/Fayette, KY	307,370	4,424	14.4	327,130	4,447	13.6	6%	1%	-6%
56. Tampa, FL	351,854	4,818	13.7	392,284	5,045	12.9	11%	5%	-6%
57. St. Paul, MN	290,681	4,932	17.0	314,825	4,973	15.8	8%	1%	-7%
58. Fort Worth, TX	805,796	11,787	14.6	966,549	13,156	13.6	20%	12%	-7%
59. Portland, OR	605,898	14,489	23.9	665,438	14,662	22.0	10%	1%	-8%
60. San Jose, CA	986,443	16,067	16.3	1,018,924	15,221	14.9	3%	-5%	-8%
61. Lubbock, TX	241,278	2,228	9.2	263,561	2,228	8.5	9%	0%	-8%
62. Charlotte/ Mecklenburg, NC	999,426	21,293	21.3	1,164,981	22,655	19.4	17%	6%	-9%
63. Wichita, KS	389,463	4,629	11.9	399,769	4,327	10.8	3%	-7%	-9%
64. Chula Vista, CA	258,641	2,531	9.8	278,609	2,482	8.9	8%	-2%	-9%
65. Minneapolis, MN	397,511	5,064	12.7	439,124	5,078	11.6	10%	0%	-9%
66. Arlington, VA	221,812	1,747	7.9	246,301	1,759	7.1	11%	1%	-9%
67. Las Vegas, NV	614,520	16,700	27.2	649,600	16,010	24.6	6%	-4%	-9%
68. Dallas, TX	1,254,907	22,003	17.5	1,320,535	20,835	15.8	5%	-5%	-10%
69. Irving, TX	227,124	1,919	8.4	261,915	1,988	7.6	15%	4%	-10%
70. Bakersfield, CA	368,026	5,362	14.6	410,726	5,364	13.1	12%	0%	-10%
71. Newark, NJ	277,347	847	3.1	315,285	851	2.7	14%	0%	-12%
72. Mesa, AZ	462,376	2,521	5.5	513,977	2,470	4.8	11%	-2%	-12%
73. Tulsa, OK	405,021	9,401	23.2	419,459	8,579	20.5	4%	-9%	-12%
74. New Orleans, LA	381,348	27,561	72.3	388,624	24,737	63.7	2%	-10%	-12%
75. Corpus Christi, TX	318,103	8,036	25.3	320,242	7,077	22.1	1%	-12%	-13%
76. Aurora, CO	347,654	10,436	30.0	398,994	10,409	26.1	15%	0%	-13%
77. Reno, NV	237,063	3,382	14.3	273,593	3,390	12.4	15%	0%	-13%

	2016			2023			Change		
City	Population	Park Acreage	Park Acreage Per 1,000 Pop.	Population	Park Acreage	Park Acreage Per 1,000 Pop.	Population	Park Acreage	Park Acreage Per 1,000 Pop.
78. Boise, ID	215,171	4,351	20.2	240,861	4,227	17.5	12%	-3%	-13%
79. Jersey City, NJ	258,411	1,072	4.1	304,261	1,090	3.6	18%	2%	-14%
80. Norfolk, VA	246,717	2,153	8.7	239,027	1,792	7.5	-3%	-17%	-14%
81. Arlington, TX	373,453	4,714	12.6	399,679	4,321	10.8	7%	-8%	-14%
82. San Diego, CA	1,343,525	45,392	33.8	1,394,592	40,122	28.8	4%	-12%	-15%
83. Seattle, WA	650,834	6,590	10.1	761,152	6,480	8.5	17%	-2%	-16%
84. Durham, NC	247,536	2,747	11.1	296,031	2,755	9.3	20%	0%	-16%
85. Plano, TX	272,923	5,152	18.9	291,554	4,588	15.7	7%	-11%	-17%
86. Omaha, NE	422,895	10,621	25.1	497,645	10,336	20.8	18%	-3%	-17%
87. Chandler, AZ	249,634	1,623	6.5	284,103	1,518	5.3	14%	-6%	-18%
88. Henderson, NV	275,333	5,559	20.2	331,701	5,504	16.6	20%	-1%	-18%
89. Raleigh, NC	434,891	13,014	29.9	480,766	11,804	24.6	11%	-9%	-18%
90. Orlando, FL	259,448	3,387	13.1	321,040	3,411	10.6	24%	1%	-19%
91. Austin, TX	856,569	20,714	24.2	1,003,496	19,069	19.0	17%	-8%	-21%
<b>Total</b>	<b>58,504,051</b>	<b>1,913,457</b>	<b>32.7</b>	<b>62,011,311</b>	<b>1,923,689</b>	<b>31.0</b>	<b>6%</b>	<b>1%</b>	<b>-5%</b>

The park creation gap was even more pronounced in faster growing cities (Table D.2). Faster growing cities have been adding more park space than slower growing cities, but this additional park space has not been sufficient to keep pace with population growth.

**Table D.2. Comparison of Park Acreage Per Capita Trends by City Population Growth Rates, 2016–23**

Cities by Population Growth	# Cities	Average % Change		% Cities "Keeping Pace"
		Park Acreage	Park Acreage Per 1,000 Pop.	
Declining Population <0%)	15	3%	8%	67%
Low Growth (0–5%)	17	4%	1%	35%
Medium Growth (5–13%)	40	6%	-2%	35%
High Growth (13%+)	50	7%	-9%	15%

# Endnotes

- 1 Reuben, A., Rutherford, G. W., James, J., & Razani, N. (2020, December). Association of neighborhood parks with child health in the United States. *Preventive Medicine*, 141, 106265. <https://doi.org/10.1016/j.ypmed.2020.106265>.
- 2 Hughey, S. M., Shulaker, B., Mowen, A. J., & Kaczynski, A. T. (2019). Promoting physical activity in parks and recreation. In *Physical activity and public health practice*. Springer Publishing Company.
- 3 Sturm, R., & Cohen, D. (2014). Proximity to urban parks and mental health. *Journal of Mental Health Policy and Economics*, 17(1), 19–24.
- 4 Foderaro, L. W. (2024, May). *The power of parks to strengthen community: A special report*. Trust for Public Land. <https://www.tpl.org/parks-strengthen-community-report>.
- 5 U.S. Department of Health and Human Services. (2023). *Our epidemic of loneliness and isolation: The U.S. Surgeon General's advisory on the healing effects of social connection and community*. <https://www.hhs.gov/sites/default/files/surgeon-general-social-connection-advisory.pdf>.
- 6 Foderaro, L. W. (2022, May 4). *The power of parks to address climate change: A special report*. Trust for Public Land. <https://www.tpl.org/parks-address-climate-change-report>.
- 7 Hughey, S. M., Walsemann, K. M., Child, S., Powers, A., Reed, J. A., & Kaczynski, A. T. (2016, April). Using an environmental justice approach to examine the relationships between park availability and quality indicators, neighborhood disadvantage, and racial/ethnic composition. *Landscape and Urban Planning*, 148, 159–169. <https://doi.org/10.1016/j.landurbplan.2015.12.016>.
- 8 Rigolon, A., Browning, M., & Jennings, V. (2018, October). Inequities in the quality of urban park systems: An environmental justice investigation of cities in the United States. *Landscape and Urban Planning*, 178, 156–169. <https://doi.org/10.1016/j.landurbplan.2018.05.026>.
- 9 Frumkin, H. (2005). Guest editorial: Health, equity, and the built environment. *Environmental Health Perspectives*, 113(5), A290–A291.
- 10 Trust for Public Land. (2023). *ParkServe®*. <https://www.tpl.org/parkserve>.
- 11 Ibid.
- 12 Texas State Legislature. (2023). Texas House Bill 1526. <https://legiscan.com/TX/bill/HB1526/2023>.
- 13 Raitt, J. (2022, January). Ending zoning's racist legacy. *Zoning Practice*. <https://www.planning.org/publications/document/9227445/>.
- 14 Rothstein, R. (2017). *The color of law: A forgotten history of how our government segregated America*. Liveright Publishing Corporation.
- 15 Ibid.
- 16 McGhee, H. (2021). *The sum of us: What racism costs everyone and how we can prosper together*. One World.
- 17 Ibid.
- 18 Centers for Disease Control and Prevention. (2024, February 8). Strategies for Physical Activity Through Community Design. U.S. Department of Health and Human Services. <https://www.cdc.gov/physical-activity/php/strategies/increasing-physical-activity-through-community-design-prevention-strategies.html>.
- 19 Powell, L. M., Slater, S., Chaloupka, F. J., & Harper, D. (2006). *Availability of physical activity-related facilities and neighborhood demographic and socioeconomic characteristics: A national study*.
- 20 American Planning Association. (2022). *Equity in zoning policy guide*. <https://www.planning.org/publications/document/9264386/>.
- 21 Foderaro, L. W., & Klein, W. (2023). *The power of parks to promote health: A special report*. Trust for Public Land. <https://www.tpl.org/parks-promote-health-report>.
- 22 Trust for Public Land. (2020). *The heat is on*. <https://www.tpl.org/the-heat-is-on>.
- 23 National Recreation and Park Association. (2022). *The economic impact of local parks*. <https://www.nrpa.org/contentassets/f568e0ca499743a08148e3593c860fc5/2022economicimpactreport.pdf>.
- 24 American Society of Civil Engineers. (2021). Public parks. In *Report card for America's infrastructure*. <https://infrastructurereportcard.org/cat-item/public-parks-infrastructure/>.
- 25 American Planning Association. (2024). *Standard state zoning enabling act and standard city planning enabling act*. <https://www.planning.org/growingsmart/enablingacts/>.
- 26 Williams, D. A., Delgado, L. H., Cameron, N., & Steil, J. (2023). The properties of whiteness: Land use regulation and anti-racist futures. *Journal of the American Planning Association*, 89(4), 505–516. <https://doi.org/10.1080/01944363.2022.2144930>.
- 27 Cranz, G. (1989). *The politics of park design: A history of urban parks in America* (2020 ed.). The MIT Press.
- 28 Rothstein, R. (2017). *The color of law: A forgotten history of how our government segregated America*. Liveright Publishing Corporation.

- 29 Crompton, J. L. (2022). *Parkland dedication: Optimizing an underutilized resource*. Texas A&M AgriLife Extension. <https://agrilifelearn.tamu.edu/s/product/parkland-dedication-optimizing-an-underutilized-resource/01t4x000004Oi8mAAC>.
- 30 Nelson, A. C., Nicholas, J. C., Juergensmeyer, J. C., & Mullen, C. (2022). *Proportionate share impact fees and development mitigation*. Taylor & Francis.
- 31 Crompton, J. L. (2022). *Parkland dedication: Optimizing an underutilized resource*. Texas A&M AgriLife Extension. <https://agrilifelearn.tamu.edu/s/product/parkland-dedication-optimizing-an-underutilized-resource/01t4x000004Oi8mAAC>.
- 32 Mullen, C. (2018). State impact fee enabling acts. <https://www.impactfees.com/state-acts/>.
- 33 Newport Partners, LLC, & Virginia Polytechnic Institute and State University. (2008). *Impact fees and housing affordability: A guidebook for practitioners*. U.S. Department of Housing and Urban Development.
- 34 Crompton, J. L. (2022). *Parkland dedication: Optimizing an underutilized resource*. Texas A&M AgriLife Extension. <https://agrilifelearn.tamu.edu/s/product/parkland-dedication-optimizing-an-underutilized-resource/01t4x000004Oi8mAAC>.
- 35 For discussion of a recent Texas ban on commercial ordinances and limitations on higher-density areas, see: Hernandez, N. (2023, September 28). New state law limits Austin's Parkland Dedication Ordinance. *Austin Monitor*. <https://www.austinmonitor.com/stories/2023/09/new-state-law-limits-austins-parkland-dedication-ordinance/>.
- 36 Crompton, J. L. (2022). *Parkland dedication: Optimizing an underutilized resource*. Texas A&M AgriLife Extension. <https://agrilifelearn.tamu.edu/s/product/parkland-dedication-optimizing-an-underutilized-resource/01t4x000004Oi8mAAC>.
- 37 City of Atlanta. (2024, August 2). Code of Ordinances, Chapter 1, Development Impact Fees, Section 19-1008: Sec. 19-1008. Requirements for assessment and calculation of impact fees—generally. [https://library.municode.com/ga/atlanta/codes/code\\_of\\_ordinances?nodeId=PTIIICOORANDECO\\_PT19FEPELICH\\_CH1DEIMFE\\_S19-1008REASCAIMFEEN](https://library.municode.com/ga/atlanta/codes/code_of_ordinances?nodeId=PTIIICOORANDECO_PT19FEPELICH_CH1DEIMFE_S19-1008REASCAIMFEEN).
- 38 Crompton, J. L. (2022). *Parkland dedication: Optimizing an underutilized resource*. Texas A&M AgriLife Extension. <https://agrilifelearn.tamu.edu/s/product/parkland-dedication-optimizing-an-underutilized-resource/01t4x000004Oi8mAAC>.
- 39 Texas State Legislature. (2023). Texas House Bill 1526. <https://legiscan.com/TX/bill/HB1526/2023>.
- 40 Crompton, J. L. (2022). *Parkland dedication: Optimizing an underutilized resource*. Texas A&M AgriLife Extension. <https://agrilifelearn.tamu.edu/s/product/parkland-dedication-optimizing-an-underutilized-resource/01t4x000004Oi8mAAC>.
- 41 Newport Partners, LLC, & Virginia Polytechnic Institute and State University. (2008). *Impact fees and housing affordability: A guidebook for practitioners*. U.S. Department of Housing and Urban Development.
- 42 Ibid.
- 43 Mullen, C. (2018). State impact fee enabling acts. <https://www.impactfees.com/state-acts/>.
- 44 Ibid.
- 45 Newport Partners, LLC, & Virginia Polytechnic Institute and State University. (2008). *Impact fees and housing affordability: A guidebook for practitioners*. U.S. Department of Housing and Urban Development.
- 46 Illinois Association of Realtors. (2018). Impact fees in Illinois. [https://www.illinoisrealtors.org/wp-content/uploads/2018/01/Impact\\_Fees.pdf](https://www.illinoisrealtors.org/wp-content/uploads/2018/01/Impact_Fees.pdf).
- 47 A list of these cities and their policies is shared in Appendices A and B of this report.
- 48 Crompton, J. L. (2022). *Parkland dedication: Optimizing an underutilized resource*. Texas A&M AgriLife Extension. <https://agrilifelearn.tamu.edu/s/product/parkland-dedication-optimizing-an-underutilized-resource/01t4x000004Oi8mAAC>.
- 49 Duncan Associates. (2016). *Park impact fee and land dedication policy and public facility needs assessment*. City of Madison, Wisconsin. <https://www.cityofmadison.com/parks/documents/ImpactFeesNeedsAssessment.pdf>.
- 50 Ibid.
- 51 Ibid.
- 52 Ibid.
- 53 Newport Partners, LLC, & Virginia Polytechnic Institute and State University. (2008). *Impact fees and housing affordability: A guidebook for practitioners*. U.S. Department of Housing and Urban Development.
- 54 U.S. Census Bureau. (2022, December 29). *Nation's urban and rural populations shift following 2020 census* [Press release]. <https://www.census.gov/newsroom/press-releases/2022/urban-rural-populations.html>.
- 55 Harnik, P., & Yaffe, L. (2013). *Who's going to pay for this park?* Trust for Public Land. [https://www.tpl.org/wp-content/uploads/2013/12/ccpe\\_who\\_is\\_going\\_to\\_pay.pdf](https://www.tpl.org/wp-content/uploads/2013/12/ccpe_who_is_going_to_pay.pdf).
- 56 Crompton, J. L., & Ellis, G. D. (2020). Is a decline in park provision inevitable in fast-growth cities? Evidence from Texas. *Journal of Park and Recreation Administration*, 40(2). <https://js.sagamorepub.com/index.php/jpra/article/view/10618>.

- 57 Crompton, J. L. (2022). *Parkland dedication: Optimizing an underutilized resource*. Texas A&M AgriLife Extension. <https://agrilifelearn.tamu.edu/s/product/parkland-dedication-optimizing-an-underutilized-resource/01t4x000004Oi8mAAC>.
- 58 Harnik, P., & Yaffe, L. (2013). *Who's going to pay for this park?* Trust for Public Land. [https://www.tpl.org/wp-content/uploads/2013/12/ccpe\\_who\\_is\\_going\\_to\\_pay.pdf](https://www.tpl.org/wp-content/uploads/2013/12/ccpe_who_is_going_to_pay.pdf).
- 59 Crompton, J. L. (2022). *Parkland dedication: Optimizing an underutilized resource*. Texas A&M: AgriLife Extension. <https://agrilifelearn.tamu.edu/s/product/parkland-dedication-optimizing-an-underutilized-resource/01t4x000004Oi8mAAC>.
- 60 Rigolon, A., Giamarino, C., & Christensen, J. (2023). Development fees and park equity in Los Angeles. *Journal of the American Planning Association* 90(2), 230–246. <https://www.tandfonline.com/doi/abs/10.1080/01944363.2023.2201279>.
- 61 Harnik, P., & Yaffe, L. (2013). *Who's going to pay for this park?* Trust for Public Land. [https://www.tpl.org/wp-content/uploads/2013/12/ccpe\\_who\\_is\\_going\\_to\\_pay.pdf](https://www.tpl.org/wp-content/uploads/2013/12/ccpe_who_is_going_to_pay.pdf).
- 62 City of Madison Parks Division. (2018). *2018–2023 park and open space plan*. City of Madison, Wisconsin. <https://www.cityofmadison.com/parks/projects/2018-2023-park-open-space-plan>.
- 63 Office of the City Clerk, San Diego. (2021, August 13). Resolution of the Council of the City of San Diego adopting a new citywide park development impact fee. [https://docs.sandiego.gov/council\\_reso\\_ordinance/rao2021/R-313688.pdf](https://docs.sandiego.gov/council_reso_ordinance/rao2021/R-313688.pdf).
- 64 Ibid.
- 65 Rigolon, A., Giamarino, C., & Christensen, J. (2024). Development fees and park equity in Los Angeles. *Journal of the American Planning Association*, 90(2), 230–246. <https://doi.org/10.1080/01944363.2023.2201279>.
- 66 Rigolon, A., & Németh, J. (2020). Green gentrification or “just green enough”: Do park location, size and function affect whether a place gentrifies or not? *Urban Studies*, 57(2), 402–420. <https://doi.org/10.1177/0042098019849380>.
- 67 Reibel, M., Rigolon, A., & Rocha, A. (2021). Follow the money: Do gentrifying and at-risk neighborhoods attract more park spending? *Journal of Urban Affairs*, 45(5), 923–941. <https://www.tandfonline.com/doi/full/10.1080/07352166.2021.1886857>.
- 68 Rigolon, A., & Christensen, J. (2019). *Greening without gentrification: Learning from parks-related anti-displacement strategies nationwide*. Institute of the Environment and Sustainability, University of California, Los Angeles. <https://www.ioes.ucla.edu/wp-content/uploads/Greening-without-Gentrification-report-2019.pdf>.
- 69 Rigolon, A. (2024). *Great parks should not uproot communities: Green gentrification risk factors and anti-displacement options*. Trust for Public Land. <https://www.tpl.org/great-parks-should-not-uproot-communities>.
- 70 Klein, W. (2022). Why are city parks struggling to keep up? *GFRC Blog*. Government Finance Research Center, College of Urban Planning and Public Affairs, University of Illinois, Chicago. <https://gfrf.uic.edu/the-government-finance-research-blog/why-are-city-parks-struggling-to-keep-up/>.
- 71 Roth, K. (2021, February). How strained budgets led to maintenance deferments and capital project delays. *Parks & Recreation*. <https://www.nxtbook.com/nrpa/ParksRecreationMagazine/february-2021/index.php#/p/14>.
- 72 See: U.S. Census Bureau. (2019, April). *Individual state descriptions: 2017*. <https://www.census.gov/content/dam/Census/library/publications/2017/econ/2017isd.pdf>.
- 73 Unger, A. (2019). Business improvement districts in the United States: Private government and public consequences. *Journal of Urban Affairs*, 41(6), 875–877. <https://www.tandfonline.com/doi/abs/10.1080/07352166.2018.1547550?journalCode=uja20>.
- 74 Rigolon, A., & Németh, J. (2018). Privately owned parks in new urbanist communities: A study of environmental privilege, equity, and inclusion. *Journal of Urban Affairs*, 40(4), 543–559. <https://www.tandfonline.com/doi/full/10.1080/07352166.2017.1360739>.
- 75 Ibid.
- 76 Central Park Conservancy. (n.d.). *Five Borough Program*. New York City. <https://www.centralparknyc.org/institute/five-borough-program>.
- 77 Foderaro, L. (2014, October 19). With training program, Central Park Conservancy spreads its wealth. *New York Times*. <https://www.nytimes.com/2014/10/20/nyregion/with-training-program-central-park-conservancy-spreads-its-wealth.html>.
- 78 Uberoy, U., & Collins, K. (2023, July 21). New Yorkers got broken promises. Developers got 20 million sq. ft. *New York Times*. <https://www.nytimes.com/interactive/2023/07/21/nyregion/nyc-developers-private-owned-public-spaces.html>.







Trust for Public Land is a national nonprofit  
that works to connect everyone to the  
benefits and joys of the outdoors.

[tpl.org](https://www.tpl.org)



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

## Re: RAP COMMISSION - NOVEMBER 7, 2025 GENERAL PUBLIC COMMENT/REQUEST RAP COMMISSION ACTION

1 message

Rap Commissioners <rap.commissioners@lacity.org>  
To: Lisa Baca

Thu, Nov 6, 2025 at 8:24 AM

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners

On Wed, Nov 5, 2025 at 6:58 PM Lisa Baca  
Greetings All"

wrote:

### **FORMAL REQUEST RAP COMMISSIONERS: NOVEMBER 7, 2025 GENERAL PUBLIC COMMENT**

I am respectfully requesting this email communication be submitted under GENERAL PUBLIC COMMENT at the MEETING OF THE BOARD OF RECREATION AND PARK COMMISSIONERS OF THE CITY OF LOS ANGELES

Thursday, November 6, 2025 at 9:00 a.m. to be held at the Mar Vista Recreation Center 11430 Woodbine Street, Los Angeles, CA 90066.

I am respectfully requesting Ms. Renata Simiril, Chair of the RAP Commission, and: **LUIS SANCHEZ, VICE PRESIDENT TAFARAI BAYNE, COMMISSIONER MARIE LLOYD, COMMISSIONER BENNY TRAN, COMMISSIONER** make a formal inquiry into the current PlayLA contracting process and *FIX* the current gaps in the contracting/staff follow up process for providing equestrian educational services as part of the PlayLA funded 2028 LA Olympics.

**PLEASE REVIEW THE FALL 2025 & SPRING 2026 BID REQUEST DOCUMENTS** and address all of the staff concerns prior to releasing the equestrian educational services bid request.

### **BACKGROUND:**

I was present for today's 5:30pm to 6:30pm Google Team call with PlayLA to address "Staff Concerns". This is the THIRD communication I have had to complete for the Fall 2025 bid. NO ONE ever came on the call. I repeatedly called/texted Veronica Polanco today without any reply.

### **EQUESTRIAN SPORTS EQUALITY PLAYLA FUNDING**

The LA Olympic 2028 Equestrian Competition to be held at Santa Anita Race Track is expected to be a sold out event and generate GLOBAL attention and revenue. Over 200 athletes and horses are expected to compete AT A SOLD OUT EVENT between July 14-30, 2028.

I am deeply concerned that PlayLA staff has ZERO commitment in promoting equestrian educational sports based on the PAST THREE YEARS of total amount of PlayLA budget expenditures for equestrian programming when compared to other sports in the annual RAP/PlayLA budgets.

I am not alone in my concern for equity in equestrian educational services. I also contacted The Equitation School (TES), linke Monteverde Ranch Equestrian Center, they are also an approved PlayLA vendor. Their experience for FALL 2025 is similar to mine. It has been more than 2 years since TES has had any PlayLA participant at their program.

The PlayLA staff communication is not done in a timely manner, follow up with inconsistent and like today's 530pm scheduled conference call with Veronica Polanco, even when there is an appointed time, staff is NOT present, does not call to cancel and there is nothing but SILENCE.

### **BIDDING PROCESS ERRORS**

Additionally, there are errors made in the bidding process regarding the "staff concerns" with what was presented in our bid responses to the follow up questions we must answer in our interview or post interview emails.

**(PLEASE SEE ENCLOSED EMAIL THREAD JUST FROM THIS WEEK - There have been others in the past weeks).**

For Example: At NO TIME DID MONTEVERDE RANCH EQUESTRIAN CENTER WRITE IN THE BID PROPOSAL or say in our in person interview that WE WOULD USE WOODEN HORSES in any part of the proposal. Yet this was a PlayLA staff concern DELAY for me to move forward to the final selection round.

### **FALL 2025 & SPRING 2026 BID IS THE SAME**

The SAME Fall 2025 bid document that has flaws with multiple PlayLA staff concerns and issues, is currently being used for the PlayLA Spring 2026 bid request.

1. Based on the current bidding selection and process for Fall 2025 by PLAYLA/RAP contracting staff, Monteverde Ranch Equestrian Center will respectfully withdraw from the time left for the Fall 2025 period.
2. Additionally, we will NOT be bidding on the Spring 2026 that is due in 48 hours on NOVEMBER 7, 2025.

There must be a better way to do the PlayLA bidding moving forward with the Equestrian Educational Services as part of the 2028 Olympic Games PlayLA Funding. **PLEASE REVIEW THE FALL 2025 & SPRING 2026 BID REQUEST DOCUMENTS** and address all of the staff concerns **prior to releasing the bid request.**

Please DO BETTER with the PlayLA bidding process going forward so we do not waste everyone's time.

Thank you for your consideration of my request.

Lisa Baca

Based on this email  
Correct?



**Veronica Polanco**

to me



Tue, Nov

4,

4:58 PM

(1 day

ago)

[Join with Google Meet](#)

Initial invite not showing up resending

**When**

Tuesday Nov 4, 2025 · 5:30pm – 6:30pm (Pacific Time - Los Angeles)

**Meeting link**

**Guests**

Veronica Polanco - organizer

**Join by phone**

[View all guest info](#)

**Reply for**

Yes

No

Maybe

More options

On Tue, Nov 4, 2025 at 10:52 AM Lisa Baca

wrote:

Request UPDATE 11.4.25

Good Morning All

No one has followed up with Monteverde Ranch regarding the Fall 2025 equestrian educational services.

The Spring 2026 bid is due this week.

Can someone please let me know the status with PlayLA?

Thank you,  
Lisa Baca  
Monteverde Ranch

On Wed, Oct 29, 2025, 6:21 AM Veronica Polanco <[veronica.polanco@lacity.org](mailto:veronica.polanco@lacity.org)> wrote:

Hi Lisa,

Thanks for the quick clarifications and the photo. I have forward to the team questions; I am off for the next two days, but if there additional questions Caroline Lammers will follow up.

Thank you,

--



**Veronica Polanco**

Chief Innovation Officer - PlayLA

Phone: (213) 842-6882

Department of Recreation and Park

[www.laparks.org/play-la](http://www.laparks.org/play-la)

On Tue, Oct 28, 2025 at 13:22 PM Lisa Baca wrote:

Hi Veronica and ALL

Here are my clarifications to the three questions sent over this morning:

**1. Staffing and Instruction Responsibilities**

- The class outline indicates RAP staff may assist in hands-on teaching (e.g., mounting horses or supporting instruction). Can you confirm that your team can in fact provide all instructors and teaching assistants, and that RAP staff will not be required to assist in instruction or physical lifting onto horses during classes but monitor children

YES, I am confirming that Monteverde Ranch staff will be providing all the instructors and assistants needed for a group of ten participants per session.

As reflected (BELOW in email) in RED to my bid response, the RAP staff is supervising and physically with the participants at all times since they are minors.

I have enclosed a photo from yesterday with the Boys and Girls Club of San Fernando Valley teens session. The teens are the ones doing the work, but their supervisor is in the arena watching (WOMAN IN BLUE PANTS) and physically with them. Ranch staff is in the arena and are the ones working with the group hands on.

## 2. Program Structure and Riding Schedule

- It was mentioned that participants will not ride horses during the first few clinics and will instead use wooden practice horses. Could you clarify the rationale behind this approach and indicate at what point in the curriculum participants will begin riding? The team would prefer if we can ensure the participants are able to ride the horses as earliest as possible during programming.

At no time during my in person interview or in my written RFP response for bidding was there any reference to "WOODEN PRACTICE HORSES". Participants are on horses and also work with MINI HORSES to build confidence in handling, grooming, walking and being around horses. In the photo you will see how well each of the teens are leading their minis. This exercise was only after 40 minutes of working with the minis.

## 3. Participant Eligibility and Weight Limits

- The proposal lists a maximum weight limit of 200 lbs, but your representative referenced 160 lbs during the meeting. Could you confirm the official participant weight limit and clarify if youth ages 13–17 who are under the maximum weight limit are eligible to participate?

Our weight limit is 200 lbs. In my in person interview, an example was given for why there is a weight limit with the horses and safety concerns. The example was:

(paraphrasing) a 5.5, 200 lbs 15 year old boy sitting in a saddle has a different weight distribution in the saddle than a 15 year old girl who is 4.1 and 160 lbs.

The weight for the girl is top heavy and easier to become unbalanced, increasing the risk of falling.

I hope this answers any concerns you may have with our Fall 2025 bid. Please feel free to reach out if I can be of assistance in clarifying any other concerns.

Thank you,  
Lisa Baca  
Monteverde Ranch  
Equestrian Center

TAKE FROM MONTEVERDE RANCH EQUESTRIAN CENTER FORMAL FALL 2025 BID RESPONSE:

### (5 min)

Riders walk to top arena learning to self-control horses/minis by individual leading and stopping them under supervision of all staff.

### (40 min) SPLIT GROUP Part 1 is 20 min / Part 2 is 20 min)

5 Participants work on mini horses basic grooming and picking of feet.

SUPERVISION: One RAP counselor with one Monteverde staff

5 Riders learn to: a. mount from the ground, b. sit correctly in saddle, c. properly holds the reins, d. walks forward, e. stop, f. turn right and left.

SUPERVISION: Two Monteverde staff

### (5 min)

Riders walk back to coral arena learning to self-control horses/minis by individually leading and stopping them under supervision of all staff.

### (15 min)

Group feedback, bathroom water break, depart.

On Tue, Oct 28, 2025 at 5:47 AM Veronica Polanco <[veronica.polanco@lacity.org](mailto:veronica.polanco@lacity.org)> wrote:

Good morning Lisa,

Thank you for submitting your proposal and for taking the time to meet with the team. After staff review, a few items require clarification to ensure the program aligns with departmental guidelines and the approved Scope of Work. Please review and provide responses to the following points:

**1. Staffing and Instruction Responsibilities**

- The class outline indicates RAP staff may assist in hands-on teaching (e.g., mounting horses or supporting instruction). Can you confirm that your team can in fact provide all instructors and teaching assistants, and that RAP staff will not be required to assist in instruction or physical lifting onto horses during classes but monitor children.

**2. Program Structure and Riding Schedule**

- It was mentioned that participants will not ride horses during the first few clinics and will instead use wooden practice horses. Could you clarify the rationale behind this approach and indicate at what point in the curriculum participants will begin riding? The team would prefer if we can ensure the participants are able to ride the horses as earliest as possible during programming.

**3. Participant Eligibility and Weight Limits**

- The proposal lists a maximum weight limit of 200 lbs, but your representative referenced 160 lbs during the meeting. Could you confirm the official participant weight limit and clarify if youth ages 13–17 who are under the maximum weight limit are eligible to participate?

We appreciate your time in addressing these questions.

Thank you,

Veronica

On Mon, Oct 27, 2025 at 5:56 PM Lisa Baca  
Zero response for contract information.

wrote:

Please update what is going on.

Thank you  
Lisa Baca  
Monteverde Ranch  
Equestrian Center

On Fri, Oct 24, 2025, 9:05 PM Chinyere Stoneham <[chinyere.stoneham@lacity.org](mailto:chinyere.stoneham@lacity.org)> wrote:

Hello Lisa,

I will follow up with staff and either Veronica or I will get back to you with an update.

On Fri, Oct 24, 2025 at 4:55 PM Lisa Baca

wrote:

Thank you Brenda I have added her to this email.

This process has been the most unorthodox municipal contracting I have ever participated in.

PlayLA is a FULLY FUNDED program with a large equestrian presence at Santa Anita Park during LA 2028 Olympics. This is not reflected currently in any of the PlayLA activity allocations.

It does not seem to be a priority for RAP or PlayLA leadership...another week gone and promises unkept.

Thank you,  
Lisa Baca  
Monteverde Ranch  
Equestrian Center

On Fri, Oct 24, 2025, 4:01 PM Lisa Baca  
Hi Veronica

wrote:

It is now Friday, October 24, 2025 and none of my emails or calls have been returned.

Obviously we are not moving forward for tomorrow with participants as I was questioned in my interview for a start date.

Can you please provide an update on where we are in the final process for Fall 2025 and what date are we to begin?

I've added TES to this email. They were also told a formal email would be sent out from RAP on TUESDAY, OCTOBER 21, 2025 confirming details.

**BOB BLUMENFIELD**

Councilmember, Third District

October 30, 2025

Jimmy Kim, General Manager  
Department of Recreation and Parks  
221 N. Figueroa St., Suite 1550  
Los Angeles, CA 90012

RE: Synthetic Turf Policy, CF: 24-0602 and Runnymede Park

Dear Jimmy;

I write to ask for your assistance with two urgent matters. First, I am concerned that the Runnymede Park improvement project (PHASE II), which is already funded and paid for, and which encompasses landscaping and other park improvements, is drastically delayed. The second issue I am writing to you about is to request your assistance in ensuring that hard-working community members who have given their time to the City to support my initiative at regulating artificial turf, CF 24-0602, are not forgotten and can participate in your RFP. Specifically, I ask your attention to both issues.

Runnymede Park improvements are important to me, and to many in the West Valley. As you know, this project consists of two phases, the first of which was completed in November 2023. Since then, my constituents have been patiently waiting for the start of phase II, which was meant to focus on landscaping and other improvements. I request that your Department focus on this project and work with my office to publicly propose and meet a realistic timeline for the project's completion. It is very important to me that this project be completed while I am still in office and before my term expires at the end of next year.

Thank you again for your team's work on the artificial turf/natural turf policy that I introduced in 2024 (CF: 24-0602), in order to ensure that plastics and toxic chemicals are not infecting our soils and watersheds. Your Department released an RFP on September 12th, 2025, and held a mandatory meeting on October 7th, with all submittals needed by November 12th. While the RFP was correctly noticed on the city's procurement process, RAMP, my office, and many community members were not notified, leading many to be surprised at the news. Although not required, meaningful outreach to my office and those who have been meeting with your staff is important. Specifically, I ask that your staff hold a second mandatory meeting, so that folks wishing to submit an RFP proposal can do so by November 11th.





**Summary of virtual meeting  
to discuss the renewal  
of the Pacific Palisades Recreation Center  
October 30, 2025**

Hosted by Jimmy Kim, General Manager, Los Angeles Dept. of Recreation and Parks  
In response to request from the Pacific Palisades Historical Society

**Attending**

For the city of Los Angeles:

Kim

Amanda Daflos, Deputy LA Mayor for Strategic Partnerships

Joyce Dominguez, Office of Strategic Partnerships Executive Officer

For the private funding entities partnering with the City:

Nick Geller, Steadfast LA Managing Director, also representing LA Strong Sports

Rodney Freeman, Project Manager for the planned redesign of the Palisades Recreation Center

For the Pacific Palisades Historical Society:

Donna Vaccarino, President

Randy Young, VP and Curator

Bill Bruns, Board member

Patrick Healy, Secretary

The meeting via Google Meet began at 4:04pm with Kim inviting introductions. Vaccarino introduced herself, Young, Bruns, and Healy, and proceeded with opening remarks. She noted that core to the Historical Society's mission is advocating for preservation of heritage and culture.

She expressed disappointment that Steadfast LA and LA Strong Sports had not sought input from the Historical Society prior to the decision to exclude the original Pacific Palisades Recreation Center building in redesigning the wildfire-damaged park property. Geller noted he had responded to an outreach from the Historical Society and met with Vaccarino and Young to discuss their concerns.

Vaccarino asked Kim to describe his vision for the Palisades Recreation Center. Before answering, Kim called on the other attendees to introduce themselves. Freeman noted his personal ties to the Palisades, including his involvement for many years in the Fourth of July parade and coaching youth sports at the Palisades Recreation Center. He said he is passionate about doing "something great for the community."

Kim then described a holistic approach of insuring high quality recreation programs for all age groups, including adults and seniors. He said this is consistent with all Recreation and Park facilities. Regarding the impact of the wildfire on the Palisades Recreation Center, Kim said his department is working closely with Steadfast LA "to bring the park back...From that perspective, our goal is to bring back normalcy."

Technical challenges caused a delay of several minutes before the next scheduled event, a presentation by Vaccarino on the history of the Palisades Recreation Center, illustrated with historic photographs and clippings, dating to its post World War II origins. The meeting was transferred to Zoom, but then there was a low audio problem. Young took over presenting most of the narration, with comments by Vaccarino that were difficult for the attendees to hear. The presentation highlighted the original vision for the Recreation Center as not only a sports gymnasium, but also a "community clubhouse" with a stage. In addition to youth sports, it has hosted a variety of adult events, from meetings to dances and pageants. Vaccarino noted the distinctive clerestory windows are an architectural signature of the building, and offered her opinion as a licensed architect that the building has historic value. In the same era, the City of LA also built four similar gyms designed by architects Bennett & Bennett. The one in Pacoima has since been remodeled.

## **Page 2, Palisades Rec Center Meeting, October 30, 2025**

Whether or not the proposed larger, modern gymnasium is built on the Recreation and Parks property in Pacific Palisades, Vaccarino and Young contended the original Palisades Recreation Center building should not be razed, but instead considered for adaptive re-use. It survived the January 7th wildfire with minimal damage, and was quickly put to use by the LA DWP, and since then has served as a meeting site. Vaccarino and Young asserted it should continue to serve as a “central gathering space,” as it did for the October 7th Advisory Board meeting.

Young also voiced concern about how the redesign process is moving forward, and said the Historical Society worries that certain design features of the park renewal are being “locked into place” before facing a public hearing. Young said the Historical Society wants the opportunity to make its presentation to the community and to the city.

Kim thanked Young and Vaccarino for their comments, and suggested a presentation to the community could be made through the Park Advisory Board “or other means.” Kim said requesting a presentation to the Recreation and Parks Commission is “more complicated.” but could be achieved by speaking to the Commission during public comment and requesting a full hearing, or by making the request via email to [rap.commissioner@lacity.org](mailto:rap.commissioner@lacity.org) and asking for the item to be agendaized.

Young responded that PPHS has reason to worry the Park Advisory Board may not offer a fair forum, given the position it took during its October 7th meeting, and the strong opinions expressed then by the Advisory Board Chairman.

Kim also suggested that the Historical Society can speak further to Steadfast LA.

Kim confirmed that the Historical Society is aware of the process for seeking to nominate a site as a Historic-Cultural Monument, and noted that this process operates outside the Recreation and Parks Department.

Healy stated a three-part summation of the Historical Society’s position:

First: in the Historical Society’s assessment, the recreation center redesign plans made public do not appear to provide adequate and appropriate space for community uses, other than sports, that the Palisades Rec Center historically has provided.

Second: the existing original Recreation Center building already offers that community space, and also has historical value, and therefore should be considered for adaptive re-use for community needs beyond sports. It should not be razed. The Historical Society does NOT oppose construction of a separate, modern sports gymnasium.

Third: these factors need to be considered by the City of Los Angeles and its partners before proceeding with the renewal of the Palisades park property. Now is the time for this consideration, so as not to delay a renewal that meets the needs of a community currently without its park.

Kim said he appreciates the historical context, reiterated his goal of providing programming for all ages, and pledged his openness to listening.

The meeting ended at approximately 4:45pm.

Submitted by  
Patrick Healy  
PPHS Secretary  
10-31-25

# Public Statement to the Los Angeles City Board of Commissioners for Recreation and Parks

Good morning Commissioners,

My name is Kari Weaver, and I have been a proud resident and taxpayer of Los Angeles for the past 26 years. I've raised my family here, worked here, and volunteered within our city's school system. Earlier this year, I experienced the loss of my home in the Pacific Palisades fire — a reminder of how closely our lives are tied to the health of our environment.

Today, I want to address an issue of growing concern to me and many residents: the increasing use of **artificial turf** in our city's public parks and recreational spaces. As a mother of three children who have grown up playing in our community parks, I believe strongly that **we must preserve and expand natural grass areas** — not replace them with artificial materials.

specifically  
the  
discussion  
for AT  
in Palis.  
Rec  
Park  
Playing  
Field

Natural grass plays an essential role in our ecosystem. Like trees and other plants, it removes carbon dioxide from the air and releases oxygen, helping improve the air we breathe. Healthy grass also acts as a natural filter — capturing dust, cooling the surrounding area, and nourishing the soil beneath it. It prevents land erosion and supports biodiversity in ways that artificial turf simply cannot.

There is a misconception that natural grass cannot be water-wise. In fact, when properly maintained, grass can be an efficient and sustainable choice. Facilities such as BMO Stadium — home to LAFC and Angel City FC — maintain lush, natural turf through professional care and best practices. With proper protocols and trained groundskeepers, our city fields can thrive in a responsible, water-conscious way. This also opens **career and educational opportunities** for those interested in sports turf management — a growing and valuable profession.

Perhaps most importantly, natural grass contributes to the **emotional and physical health** of our community. Research shows that exposure to living landscapes — walking barefoot on grass, smelling the earth, seeing green — has measurable benefits for mental health. It reduces stress, promotes happiness, and enhances our overall sense of well-being. Our children deserve to play on real grass — to feel connected to nature in a city already filled with so much concrete.

## In Closing

Our parks are sacred spaces — they are where families gather, children grow, and communities connect. I urge the Board to protect these natural environments and to prioritize **living landscapes** over synthetic surfaces. Natural grass supports not only our air, soil, and water — but also the health and happiness of every Angeleno who steps into a park.

Thank you for your time and commitment to our city's future. I appreciate the opportunity to share my perspective and will leave some handouts with additional information for your review.

# Smarter, Safer, and More Sustainable Fields

## Evidence-Based Facts from the “Smarter Natural Grass” Webinar

*Hosted by Resilient Palisades – November 3, 2025*

**Purpose:** To share science-based information about the health, environmental, and economic impacts of synthetic turf — and the proven, sustainable alternatives that protect our kids, our community, and our coastline.

---

### HEALTH & SAFETY

**Speaker:** *Amy Griffin, U.S. Deaf Women’s National Team*

- **No safety studies:** Despite decades of use, no independent epidemiological study has proven artificial turf is safe for children or athletes.
  - **Injury risk:** Higher rates of concussions, heat illness, and “turf burns,” which can become infected with antibiotic-resistant bacteria (including MRSA).
  - **Cancer connections:** Hundreds of documented cases of blood cancers among young soccer players—especially goalkeepers—who have long, close contact with synthetic turf infill made from ground-up tires containing carcinogens and PFAS “forever chemicals.” (Note: Though crumb rubber is not being used in some new artificial turf options, crumb rubber does not account for all the chemical exposers. The blades of artificial turf are comprised of polyethylene and polypropylene, which are made from petroleum and natural gas.)
- 

### ENVIRONMENTAL IMPACT

**Speaker:** *Dianne Woelke, Safe Healthy Playing Fields*

- **Microplastics:** Each field sheds 2,000–3,000 lbs. of plastic blades every year, contributing up to 25% of near-surface microplastics in waterways.
- **Toxins:** Synthetic turf releases heavy metals, and other hazardous chemicals that contaminate soil, air, and water.
- **Heat islands:** Turf can reach 160–200°F, emitting methane, CO<sub>2</sub>, and ethylene gases that accelerate climate change and create burn hazards.
- **Non-recyclable waste:** Old fields are piling up in landfills and illegal dumps across California. Most are ultimately burned or abandoned, releasing toxic fumes.
- **Wildfire & runoff risk:** Turf increases heat, by creating a ‘heat island effect’, runoff, and impervious surface area — all worsening local fire and landslide threats.

along with the use of bridge fertilizers, significantly improved soil biology, resulting in healthier turf and reduced input requirements over time.

- **Comparable maintenance:** Organic management costs roughly **\$0.48–\$0.55 per square foot**, similar to or less than the current Palisades budget.
  - **Long-term savings:** Artificial turf must be replaced every 8–10 years, costing **up to 10× more** to install and remove than natural grass.
- 

## SMARTER SOD & NATIVE SOLUTIONS

**Speaker:** *Robert Sjoquist, Soil Solutions*

- **Native and drought-tolerant sods:** California-developed hybrids use **50–80% less water** and thrive under local sun and soil conditions.
  - **Ecosystem benefits:** Natural grass absorbs water, cools the air, supports soil biology, and reduces runoff into Potrero Canyon and the Pacific Ocean.
  - **Human health:** The “smell of cut grass” releases natural plant compounds that calm and connect us to our environment—something no plastic field can replicate.
- 

## CONCLUSIONS

- Synthetic turf is a **toxic, heat-emitting, microplastic-shedding, non-recyclable petrochemical product** that threatens both human and environmental health.
  - **Organically managed natural grass** provides safe, cost-effective, and sustainable playfields—cooler for kids, cleaner for the ocean, and better for public health.
  - Across the U.S. and Europe, cities and sports organizations are moving toward **PFAS-free, regenerative, soil-based solutions**.
  - There are sports fields in Los Angeles and other If Scottsdale, Arizona and professional teams like the San Francisco Giants can do it, **so can Pacific Palisades**.
- 

## Learn More

- Resilient Palisades
  - Safe Healthy Playing Fields
  - Beyond Pesticides
  - LA Waterkeeper
-

Our first topic is health and safety. I'd like to welcome Amy Griffin, a former U.S. Women's National Team player and longtime coach who has raised awareness about potential health risks of synthetic turf since 2009.

---

## **Health & Safety — Amy Griffin (U.S. Deaf Women's National Team)**

I coached the same demographic of athletes on the same fields for 24 years. For the first 16 years, I didn't personally know any young players with cancer. Then two goalkeepers I coached developed lymphoma. Goalkeepers, in training, hit the ground face-first dozens of times per session, getting black rubber infill ("the dots") in their eyes, mouths, and open scrapes.

Trying to reassure them, I went to colleagues at the University of Washington. What I learned was alarming: the infill comes from ground-up tires that contain carcinogens and other toxic chemicals. Tires are regulated as hazardous waste—yet here they are on children's fields.

I began keeping a list of players with cancer that I personally knew. That list—now nearing 300—has made national and international news. Roughly 59–61% of the soccer players on the list are goalkeepers. Most cancers are blood-related, and the average age at diagnosis is 12–22, far younger than typical. There's even a 14-year-old with lung cancer.

Despite the scale of synthetic turf deployment, there's no epidemiological study proving it's safe. Meanwhile, we see mounting red flags: fields aging and shedding, stockpiles of rolled-up turf near waterways, and documented harm to salmon from tire-related chemicals. When the data matches the lived experience of families and athletes, we need to take it seriously.

---

## **Environmental & Public Health Impacts — Dianne Woelke (Safe Healthy Playing Fields)**

Safe Healthy Playing Fields supports banning synthetic turf and replacing it with nature-based solutions—specifically drought-tolerant hybrid Bermudagrasses managed regeneratively with organic practices and zero-emission equipment.

Key points:



groundwater; most drinking water systems do not currently remove PFAS and similar emerging contaminants without very costly treatment.

**Water-savings fallacy:** Artificial fields require regular hosing and cooling with potable water during heat events. Over time, subgrade compaction further reduces infiltration—more runoff, more pollution, and more wasted potable water. By contrast, organically managed natural grass filters and retains water, reducing flooding and improving water quality.

---

## Sustainable Field Management — Rika Gopinath (Beyond Pesticides)

We help cities and universities transition to natural grass athletic fields without synthetic pesticides or fertilizers, using a systems approach focused on soil biology.

### Key practices & lessons:

- **Use reality, not marketing:** Artificial turf's "24/7 use, no maintenance" claims don't match field closures for heat and the need for regular cleaning/disinfection. Impact safety testing is essential; many artificial fields become too hard within 3–4 years.
- **Construction + maintenance:** Performance depends on smart field construction (drainage, soil profile) and a maintenance paradigm shift—zero synthetic inputs, feed the soil, grow dense, deep-rooted turf.
- **Results:** Organically managed fields increasingly show **25–35% less water use** and **~25% lower long-term maintenance costs**. Carrying capacity (hours of play) improves over time as soil health builds.
- **Case studies:** From Massachusetts to Colorado, natural grass complexes are meeting or exceeding play demands—often serving multiple schools and tournaments—without replacing sod.
- **Cost comparison:** A 2025 *Sustainability* study comparing three options (replace artificial turf; natural grass with conventional inputs; natural grass organic) found organically managed natural grass had the **lowest cumulative cost** and best environmental profile.

Professional teams are adopting soil-biology methods (e.g., at Oracle Park and MLS venues). This approach scales to municipal budgets and benefits the broader community by reducing heat, runoff, and chemical exposure.

---

## Cost, Operations & Soil Health — Jeff Beardsley (Beardsley Consulting)

- **Policy gap:** Unlike parking lots, artificial fields typically lack surrounding biofiltration requirements despite known runoff contaminants.

Conclusion: Select site-appropriate drought-tolerant sods, build the field correctly, and manage organically. This delivers safer play, lower long-term costs, better water outcomes, and tangible public-health benefits.

---

## Closing

Natural grass—built right and managed organically—offers a safer, cooler, and more sustainable path for community playfields than synthetic turf. The evidence across health, environment, water, cost, and performance strongly supports choosing soil-based solutions for Pacific Palisades.

an\_petition\_transaction\_report\_preserve-the-dream-keep-our-park-naturally-green\_2025-11-04-22-49

Last name	First name	Zip code	Comments
	shiloh		
Abbott-Wicker	Danett		
Abdel-Jelil	Anissa		Artificial turf is not a climate solution. Let's invest in living green spaces that cool our city and protect our health.
Abdel-Jelil	Anissa		
Alexander	Tracey		
ALLEN	WARREN		
Allnatt	Kelly		
Alper	Michele		
Alyn	Kristen		
Amos	Devyn		
Amos	Christine		No plastic turf!! Horrible idea. Keep our parks and our planet clean and green
Andersen	Beth		Artificial turf is bad for the eco system, bad for the children and burns in a fire. My real grass did not burn, but everything else I owned burned to the ground except an old Magnolia tree.
Antoniuk	Mercedes		
Appelbaum-Sch	Brigitte		
Aranha	Kate		No on plastics!
Arblaster	Gavin		
Attar	Darya		
Auerbach	Beverley		Let the kids play on grass, naturally cool and good for the environment.
August	Jane		
Baak	Tricia		
badt	polly		Artificial turf is too hot and dangerous for children to be playing on!
Baginski	Michael		
Baines	Helen		Why would you force taxpayers to cover the cost of toxic, leaching artificial grass into our beautiful environment? Would you advocate for 10,000 dyed green plastic bags on the field? That is what you are proposing. It kills the environment below it, leaches chemicals into the soil, air and water, and it gets so hot it heats the environment and has to be hosed down to clean it and cool it off. Haven't we had enough environmental disasters? What a hideous idea.
Ballardo	Porfirio		
baron	diana		Terrible for our kids, our environment and the former Field of Dreams. Please don't do this.
Baserga	Fernanda		"I support natural grass that's drought-tolerant, safe, and sustainable for our community."
Bassett	Caroline		
Bassett	Mitch		
Baum	Tracy		
Baxter	Jo		
Bazan	Belinda		
Becker	Julie		
Beegun	Norm		On top of all the other issues, we face in the Palisades with a government that doesn't want to test our soil or our environment, the last thing we need is artificial turf with all the problems it will bring. I cannot understand why government at all levels is doing nothing for our community. Doesn't seem to care about our safety or the safety of our kids or grandkids. We need transparency and answers as to why this is being done.
Bell	Bernice		
Belt	Valerie		
Berger-Davis	Tracey		Less plants means a less healthy environment! We have enough plastic around us without putting it in on our open spaces. All of us living creatures need a natural environment, its so important.
Berggreen	Amy		No to artificial turf.

Capp	Kelly	
Carpinone	Diana	
Cassaro	Nancy	
Cassidy	Maureen	Not healthy for small feet and bodies. Please reconsider.
Caster	Jacqueline	
Ceccon	Dorothy	Grass and trees are the most important part of a park. Please replace artificial turf
Ceccon	Dorothy	Please use grass for our kids!
Chamberlain	A I	
Chase	Kim	
Chase	Kim	
Christian	Sarah	
Chudacoff	Greg	
Citron	Lisa	
Clavin	Jeanette	
Clemens	John	We don't need a toxic and flammable material covering the play fields.
Cohen	Jerry	
Conroy	Roberta	Please don't add more plastics to our environment. Artificial turf has seen it's day! Not for the Palisades.
Conte	Anne	
Conte	Anne	
Conte	Anne	
contis	Denise	
Contr	Anne	
Cooper	Jim	
Corral	Jordan	After everything we've been through, we shouldn't have to fight new sources of toxins. Our community deserves better! this is no time to cut corners or choose convenience over health.
Costin	Anne	My understanding is that artificial grass is very toxic when it burns.
Cotter	Carole	We've had enough landscape altering devastation from January 7th - please keep something the same from before!!!
Cotter	Elaine	
Covey	Nancy	
Craft	Lindsey	
Craig	Ryan	
Crane	Tricia	Parents for Healthy Playing Fields
Crawford	Karen	
Crystal	Janice	
Crystal	Janice	
Crystal	Janice	
Crystal	Michelle	
Csiszar	Theresa	
Cummings	James	Artificial turf is toxic, it melts, its contaminates people, soil & all sentiment creatures. We do not need or want synthetic substances in our parks & recreation areas. It goes against the whole concept of a park. Natural beauty comes from living flora & fauna, not repurposed petroleum products. Temporarily located out of area as our property is uninhabitable in part from electronic gear & substances vaporized on January 7.
Curland	Louise	Please keep it real and natural! We won't play on fake turf because of the microplastics and toxins :( with zone zero, and now this we are losing so much nature...
Czerniewski	Lily	
Czerniewski	Audrey	
Dahlberg	Steve	
Dahlberg	Stephanie	

farkas	tanya		NO toxic artificial turf !! Green grass can help to regulate temperatures !!  We strongly oppose the proposed replacement of natural grass at the Field of Dreams with artificial turf and urge the city to instead use modern, drought-tolerant natural grass. We also urge the LA Department of
Feld	Kate		
Feldman	Becky		I support natural environments to help our community thrive! We will need all the support we can get from nature after this disaster. Please do not add to the multitude of problems our environment is facing by adding turf to any of our public spaces. Thank you!
Feldon	Mira		
Fell	Allison		Though we do not live in the Palisades area, my daughter does attend school there
Fell	Allison		Though we do not live in the Palisades area, my daughter does attend school there
ferguson	grace		
Fern	Danielle		
Fetter	Margaret		
Filler	Wyatt		
Finger	Stefanie		
Finnerman	Carla		
Fishkin	Erica		
Fitzgerald	Susan		
Flaherty	Isabelle		Thank you for presenting this petition. I remember the painful "turf burns" my kids' teams would get if they took a fall on a turf soccer field. And the particles that come from the breakdown of the turf. Please stick with real grass
Flynn	Rowan		
Foley	Jennifer		I grew up in Pacific Palisades. Please keep it green. No more chemicals.
Foley	Michael		
Ford	Chelsea		We need real grass!!!
Ford	Rich		No fake grass!
Fox	Laurel		We recently visited our former street that was ravaged by the Palisades fire. Amidst the healing ocean breeze, we were overwhelmed by the noxious smell from the plastic playground recently installed at the Palisades Recreation Center. This is a travesty! Please please please after all this community has endured, replace this plastic with natural materials and stop all efforts to use artificial, potentially toxic materials in play areas. Thank you so much!
Fox	Douglas		
Francis	JOyce		No plastic grass at Palisades Park !
Friedman	Janelle		Please.
Friedman	Carol		
Friedman Frank	Aurelia		
Frisch	Randi		
Fry	Patricia		
Fuhrman	Susan		
Funke	Emily		What a bad idea!!!!  REAL green grass is the only grass we want in our park. Fake grass is unhealthy , fades and looks bad and
Gangi	Carolyn		
garcia-toledo	Aida		plastic turf contains: pfas, antimicrobias, gives off microplastics and , depending on the infill, much more
Gardner	Maureen		
Garff	Wendy		
garland	leah		
Garrett	Regena		Exercise on natural turf is far superior to plastic underfoot!
Gedgaudas	Rasa		
Gibbons	Sarah		! Our kids deserve real grass. Not toxic plastic fields that burn feet and pollute our ocean

Gurlo	Tatyana	
Gurvis	Laurie	
Gutierrez	Barbara	
Hacker	Maurine	
Hall	Lesly	We don't need to add anymore toxic chemicals to this area. Please keep it this area natural and safer for children and families.
Hall	Greer	
Hall	Kaylin	
Handler	Eric	Do not poison the park.
Harelik	Justin	
Harr	Mary-Kathe	
Harrigan	Molly	Keep it green!!
Harris	Lyuba	Plastic also disintegrates with time:, leaking out harmful substances.
Hartnett	Dayle	
Hathaway	Dalena	NO ARTIFICIAL TURF
Hawken	Brittan	
Hayes	Susan	
Hazi	Nora	After seeing the ecological damage artificial turf made during the Palisades fires, I can't believe the LA Department of Recreation and Parks is installing artificial turm at the Pacific Palisades Rec Center. This is unconscionable.
Heisler	Eileen	
Heisler	Eileen	
Hieronymus	Vicki	Mother nature knew what she was doing. Whole Biosystems depend on natural grass and Wild flowers: Bugs, worms, microorganisms, birds, butterflies, and bees among many, many Other forms of life.
Higgins	Nicole	
Hinton	Susan	Besides reasons highlighted above, burning plastic results in lasting poisonous particulates & gases. Though no one knows if there will ever be urban fire on the scale of this year's earlier set, it's possible to prevent off-gassing of devastating poisons by growing drought tolerant grasses in place of acres of plastic. Then, should there be another fire, you would look like a genius.
Ho	Kerry	Please make sure to keep this a green space. Plastic grass is so bad for the microorganisms in the soil and the trees around the area and the heat radiates from the plastic.  Pediaticians don't like that plastic particles that get into cuts and scrapes when kids fall and crash into this plastic like on artificial turf soccer fields.
Hobson	Courtney	
Holiday	Chase	
Holt	Lorraine	
Hope	Jennifer	
Hopkins	Milly	
hopkins	karen	PLS - the more green that is real the better. How can you install without community permission?
Howard	David	
Hudson	Suzanne	



Hume	Suzanne	<p><a href="http://CleanEarth4Kids.org">CleanEarth4Kids.org</a> asks you to reject all uses of synthetic turf/artificial grass.</p> <p>Doctors, nurses, health professionals, children's health organizations, public health organizations, researchers, and the public are deeply concerned with the toxic and carcinogenic chemicals, heavy metals like lead and cadmium, benzene, Polycyclic Aromatic Hydrocarbons (PAHs), phthalates, styrene, Volatile Organic Compounds (VOCs) and per- and polyfluoroalkyl substances (PFAS) are found in the plastic blades, backing, underlayment pads and in some plant based infills added to keep the blades upright.,</p> <p>Synthetic Turf/Artificial Grass is PLASTIC</p> <p>Synthetic turf/artificial grass is made of mixed plastics, such as polyethylene, polypropylene, nylon, and more.</p> <p>Over 16,000 chemicals are used in plastics, with at least 4,200 (26%) being chemicals that are highly hazardous to human health and the environment, yet only 980 have been regulated anywhere around the world. All major plastic types tested leached hazardous chemicals, including food packaging, which alone can contain over 400 chemicals of concern. Additionally, there is little to no hazard information available for over 10,000 of these chemicals.</p> <p>Chemicals commonly found in plastics, like PFAS and phthalates, can impair reproduction, growth, and cognition. Children are the most vulnerable due to developmental windows, more rapid metabolism, respiratory rates, cardiac output, and greater caloric intake per pound. Chemicals in plastics have been linked to childhood obesity, hyperactivity, ADHD, low IQ, and asthma.</p> <p>Unborn children are especially vulnerable to toxic exposures from plastics in utero, which can "increase risks of prematurity, stillbirth, birth defects in the reproductive organs, neurodevelopmental impairment, impaired lung growth, and childhood cancer."</p> <p>There are many highly toxic chemicals found in synthetic turf, with phthalates and PFAS being some of the most studied.</p> <p>Dangers of Phthalates</p> <p>Phthalates are typically added to most plastics to make them pliable and are commonly found in plastic grass., Phthalates are known to disrupt the endocrine system and be neurotoxic. Men with higher phthalate levels have a higher risk of cardiovascular disease and type 2 diabetes. In midlife and postmenopause, women, phthalates can lead to increased body fat, a higher BMI, and increased waist circumference. Phthalates can also cause increased rates of hot flashes.</p> <p>Phthalates are linked to birth defects, infertility, miscarriages, as well as other neurological issues during child development, and can harm the endocrine system.,</p> <p>Women exposed to phthalates during pregnancy are at greater risk of preterm delivery. Human studies have determined that in-utero phthalate exposure can cause later development of type II diabetes, insulin resistance, obesity, asthma, and higher systolic blood pressure. Female offspring are more likely to experience reproductive problems, including pregnancy loss, low birth weight infants, preterm birth, and earlier menopause. Other human studies have linked phthalates to impaired motor skills in children and delayed language development. In male adults, a reduction in sperm quality and quantity has also been observed.</p> <p>PFAS in Synthetic Turf/Artificial Grass</p> <p>PFAS are used to aid the extrusion of plastic yarns for the "grass" blades.</p> <p>Every plastic grass field tested has been found to contain toxic PFAS, with industry stating plastic grass can not be made without PFAS.</p> <p>Turf companies claiming their product is PFAS-free are intentionally misrepresenting their data.</p> <p>There is no safe level of PFAS!</p> <p>PFAS can be absorbed into the body from skin contact with synthetic turf/artificial grass.</p> <p>PFAS (perfluoroalkyl and poly-fluoroalkyl substances) are a class of almost 15,000 synthetic (man-made) chemicals found in many products like artificial grass/synthetic turf, food packaging, waterproofing sprays, household cleaners, stain-resistant carpet, nonstick cookware, fire fighting foam, clothing, makeup, toilet paper, personal care products, textiles, children's products and much more.,</p> <p>PFAS as a class share many characteristics and toxicities.</p> <p>According to the CDC, EPA, and the European Union Environment Agency, PFAS are linked to low birth weight, thyroid disease, increased cholesterol, liver damage, kidney cancer, and testicular cancer. They are also linked to liver cancer, diabetes, endocrine disruption, and other serious health problems.</p> <p>PFAS bioaccumulate in our bodies, making the risk of cancers and other health problems more likely as we get older.</p> <p>Plastic Is Pollution, Harming the Environment and Our Health</p>
------	---------	---

KOUADIO	Cyriaque	
Kovac	Michael	
Kraft	Arik	
Krikheli	Jerry	We want natural grass on the field!
Krol	Paige	
Kulla-Mader	Shayda	
Kurstin	Catherine	Please keep the Palisades Park naturally green with no astroturf.
Kurtz	Austin	Austin Kurtz
Kuyt	Ilana	
Kyle	Erin	Please keep the regular grass!
Laguna	Christine	Please keep our field green. No plastic.
Lakin	Jess	Heal the land through nature!!
Lando	Kirsten	Honestly, stop f-ing things up. Leave the field of dreams the way it was before the fire, real grass. You took away the sand on the playground, don't ruin this.
Langley	Jane	
Leahy	Janet	
LeBenger	Kelly	
Leichter	Rhoda	
Lempert	Robert	
Lennard	Lisa	
Leshner	Hana	
Leva	Harriet	We lost our house after 50+ years but Palisades remains our home. We have wonderful memories of our son playing on that field. It should not contaminate with more toxic plastics that endanger the health of our kids and anyone enjoying the Field of Dreams.
Levi	Nicole	
Levin	Hope	
Levine	Loren	
Levine	Lorraine	No to artificial grass.
Levitt	Alana	
Levitt	Ellen	Plastic is highly flammable and toxic...
Levy	Hayley	Please do not use artificial turf
Levy	Doug	Please use real grass and not artificial turf. We've already lost so much greenery in the Palisades and artificial turf creates hot islands.
Liss	Mele	
londono	clara	Please do not cover the ground with astroturf. We do not want our children playing directly on synthetic materials.
Long	Jessica	
Loomis	Cindy	
Loughran	Emily	Artificial turf gets hot!!! It is also very slippery and responsible for injuries. I know—my daughter sustained a complex fracture and life long serious issues due to a simple slip and fall on artificial turf!!
Lovett	Nancy	
Low	Joanne	Please no artificial turf in our parks!!
Lueras	Michael	"Earthly life is not The True Life." (Quran 29:64)
Lukasiak	Matthew	Artificial grass causes more injuries and skin abrasions to athletes. This is bad for our kids. After everything that was taken from us after the fires, please don't take away our natural grass.
Lushing	Brian	
Lynch	Susan	
Lynch	Susan	Artificial turf is not appropriate in our parks!

Meis	Brandie		
Meis	Brandie		
Mestres	Tracy		if it isn't broken, don't fix it! Please stop overthinking, keep it simple and just the way it was!!!! Never a
Metzner	Margot		NO to artificial turf! Let our land breathe with real grass! Better for everyone!
Michels	Kathleen	-----	Please keep all our parks cool and naturally green! No hot I, toxic fake plastic or waste tire rubber !
milgrom	philippe		
Miller	Howie	-----	
Miller	Lindsay		
Miller	Lori		Los Angeles needs to show environmental leadership and stewardship. Making children play sports on a plastic playing field flies in the face of environmental, health, and quality of life concerns.
Miller	Cynthia		
Miller	Charles		
Milne	Hamish		
Milton	Meredith		
Minassian	Johanna		<p>When we lost Palisades Rec Center Park, our lacrosse team lost a field. Will Rogers was also lost. That option was gone. Neither of those parks had turf. Our community opposes turf for parks. It takes the city years to address the sprinkler systems at parks. I imagine ripped-up turf will never be addressed.</p> <p>What would serve our community is a Sports Complex upgrades. Upgrading a park into a sports complex involves construction and renovation projects, including new facilities like gyms and pools, upgraded existing sports fields, and enhanced amenities such as lighting, parking, and accessibility. Specific examples include the Rancho Cienega Sports Complex in Los Angeles, which is building new indoor facilities, and El Dorado Park in Long Beach, which is renovating its sports fields.</p>
Mindel	Nancy		Artificial turf becomes too hot and isn't a good, safe surface to play on
Moadeb	Alisa		
Mollica	Anna		
monteagle	jane		
Moore	Jordan		
morovati	Sheila		
Morra	Paris		
Morrison	Allison		
Mourad	Bessma		
Moussavi	Sarah		
Moyer	Evelyn		
Muldaur	Tracey		
Munro	Nanette		Residents should have a say about the turf at Pali Rec center.
Murray	Tracey		
Nacif	Vannessa		
Nadler	Mary		Artificial turf is not healthy for kids - please reconsider.
Naim	Holly		No fake grass - we want natural
Nakamura	Angel		
Narysheva	Svetlana	00400	
Nassour	Tripp		
Nathan	Tessa		Adding toxic plastic to the already compromised land would be a disgrace
Nelson	Meredith		
Newburn	Nathan		
Nichols	Rachel	00000	

rodman	simone	Please don't use astroturf at our rec center. It's very unhealthy for people, pets and planet.
Rogers	Michael	
Rokab	Sylvie	Please please please, keep our communities natural and healthy!
Romero	Claudia	Please keep it real.
Roostaeian	Jason	
Rosen	Melissa	
Rosenbaum	Sheryl	
Rosenberg	Colette	
Roum Tittle	Christine	
Ruddy	Catherine	
Ruddy	Catherine	
Ruderman	Jeanne	
Rudolph	Angie	
s	steph	
Sahi	Sonja	
Saidiner	Cathy	How dare you try to put in plastic grass! Shameful. Replace like for like.
Samulon	Danielle	
Sands	Susan	No fake turf for the Palisades
SANTINO	KRISTA	Please no more offgassing turf.
Sasao	Ayu	
Saxon	Reed	
Schaefer	Shannon	
Schaffer	Stephanie	
Schiller	Abbie	Natural grass looks, feels and IS better for everyone.
Schoolnik	Skip	
Schrader	Lara	Please no fake plastic grass at Pali Rec. Please stop changing the parts of the Pali Rec that don't need changing. We want to come home, whatever is left of it. We miss what we had & don't need to spend rebuild dollars on things that don't need to be changed. No to the fake grass.
Schwartz	John	what an idiotic idea the plastic grass is a disaster for humans and our environment!!!
Scruton	Jan	The stuff is horrible. It holds all kinds of nasty bacteria from pet feces to staph. Do we really need to intentionally expose our kids to more toxins?
Serna-Rodarte	Valeria	
Shafai	Lili	Please don't bring plastic turf to our community and to our children's school. This material is a health hazard and should be banned rather than used in public and private facilities.  Thank you,
Shaffer	Tracy	
Shahbazi	Arezou	
Shannon	Steve	Make it better, not worse.
Sharp	Sharon	
Shipley	Nikki	No astro turf in the Palisades! We need nature around us not more exposure to chemicals!
Short	Martin	
Sigworth	Molly	The Pali Rec Center is a focal point for our community, families and kids. Covering it with artificial turf seems like yet another hit when we are all down. There are many natural grass options that could be maintained economically and efficiently.
Silverman	Cathy	
Silverman	Cathy	
Simon	Lisa	Not a good idea this is absolutely crazy after the fire to put plastic there we don't need more toxins for our children
Simpson	Jane	
Sinaiko	Marcie	

Thompson	Regina	
Thompson	Andrea	
thornhill	olivia	
thornhill	olivia	
Tomlinson	Katie	Please keep the grass, for our children.
Treibatch	Eric	no to turf. benefits of grass far outweighs any of turf. the off gassing of the turf fill is not good for the little ones.
Trent	Ramona	Hot plastic doesn't belong anywhere
Tumen	Marion	Please use natural turf.
Udall	Kristine	This is not a good idea. You can't even walk on this stuff when it's hot. It needs to be replaced when it gets funky and worn and gets dumped into the land fill. Dumb idea!
Vaccarino	Donna	Don't be fooled / plastic grass is not GRASS ... Bad for the soil even worse for kids!
Valensi	Gaby	
Vallen	Tracy	
van	Alex	
Vanino	Ann	
Vash	Barbara	This is not the way to have a playground-use drought tolerant grasses
Vernescu	Raluca	
Vogel	Rachel	There are natural, drought-resistant ground coverages that will be much healthier and nicer.
von Goetz	Catherine	The Palisades is and is known for it's beautifully filled nature. It is surprising to me that anyone in the community would want or agree to Plastic grass. Please, please do not put plastic grass on our children's playground.
von Szeliski	Victoria	
Wald	Andrea	As Co-Founder of Community for Natural Play Surfaces I strongly support and urge decision makers to choose natural surfaces over any plastics - NO artificial turf nor PIP please! Better for the environment and health of all.
Wallace	Kelly	Keep the lawn grass and not artificial turf. Turf is made of plastic and our kids should not be playing on it.
Walters	Tara	
Ward	Cole	
Warren	Victoria	Artificial turf is not a climate solution. Let's invest in living green spaces that cool our city and protect our health. The Palisades stands for resilience — not replacing nature with plastic!
Washburn	Victoria	
waters	Richelle	Please no Astro turf!!! Fake grass is awful and so bad for the environment and our kids! Thank you
Watkins	Michelle	
Waxtein	Joan	
Weaver	Kari	Natural grass is so much better for our health and the health of our environment.
Weaver	Jack	
Weinbach	Julie	
Weinhouse	Lori	Besides being aesthetically incredibly unappealing, the environmental risks of artificial turf are well documented. That this is even being considered is outrageous.
Weisblim	Jessica	
Wessling	Judith	Please! No more plastic playing fields. Our children deserve to play on grass!
Wexler	Marilyn	
Wharton-Ali	Firdosi	
Whitaker	Christine	
White	Ivy	Real grass for a real environment. Stop leaching chemicals into the ground at every opportunity!
White	Carole	
White	Carole	

**November 6, 2025**

**Los Angeles Board of Recreation and Park Commissioners**

**cc: Heather Hutt, Councilmember, Los Angeles District 10**

[rap.commissioners@lacity.org](mailto:rap.commissioners@lacity.org)

**I'm writing regarding the new playground at the Michelle and Barack Obama Sports Complex. This new playground is an exciting development, as there are limited playground options in the area, and it is wonderful to see this addition to what has become a standout community asset. While many of us in the community are looking forward to the playground's opening, we have safety concerns about the location of the play structures that abut the road, given the fast-moving traffic and the pattern of car collisions into buildings along Obama Boulevard.**

**The current development appears to have a low perimeter fence around the playground. While this creates an inviting scene for the park, the reality is that this small barrier does not reflect the behavior of drivers or the traffic patterns along the boulevard.**



**Caption: Images of play structure at Michelle and Barack Obama Sports Complex playground construction site.**

**There are other parks in the area directly along high-traffic corridors, such as Leslie Shaw Park and Washington Irving Pocket Park. In both cases, there are protective safety measures that create a greater sense of security. Leslie Shaw Park has berms and plantings along the front perimeter that create a barrier to the street. The sidewalk itself is also wider than the sidewalk in front of the Michelle and Barack Obama Sports Complex, and the play structures are set farther into the park, with picnic tables positioned between the road and the play areas. Washington Irving Pocket Park has much taller fencing (which is not necessarily preferred) and a gate for entry and exit.**





**Caption: Leslie Shaw Park with wider sidewalk, decomposed granite, plants, cement barrier, and play structures set farther back into the park.**



**Caption: Washington Irving Pocket Park with tall fencing and closed gate for entry and exit.**

**While I understand there was a community engagement process, it seems that process took place several years ago. Since then, we've experienced a pandemic, an increase in young children living in the area, and a rise in traffic collisions estimated at 20–30% compared to pre-pandemic levels. As curiosity—and later concern—about the playground's location arose, I and other community members tried to locate the development plans but have been unable to find updated versions.**

The proposed project characteristics indicate that the intention was to plant hedges to create a physical barrier, preserve existing planters that served as a physical barrier to the road, and that the playground area would be set back from the sidewalk.

To ensure the safety of our children and community, I and other community members have several requests for the Department of Recreation and Parks to improve community engagement and promote safety at this new playground:

1. Publish online and at the site the current development plans for the park.
2. Provide channels for community input as updates to the site are made.
3. Relocate the large play structure adjacent to the sidewalk farther into the site.
4. Completely enclose the playground with fencing around the perimeter and entry/exit doors located away from the main sidewalk to prevent children from running toward the road. Increase the height of the fencing along the perimeter.
5. Add safety measures to protect from fast-moving traffic, which may include bollards, boulders, concrete planters, berms, and vegetation along the section of the playground close to the sidewalk.
6. Work with the council office, planning department, and traffic enforcement to implement and enforce traffic-calming measures, including the posting of "School Zone" and "Children at Play" signs and consistent speed limit enforcement.
7. Install bollards in the parking spaces in front of the playground to create an additional physical barrier.

We thank you for your efforts to expand parks and community spaces across Los Angeles, and for your partnership in addressing this matter of great importance to local residents.

Sincerely,

Angie Jean-Marie



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

## Re: Concern Regarding Interaction at Encino Rec Center

1 message

Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

Fri, Nov 7, 2025 at 7:46 AM

To: Tiffany Risucci

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners and staff.

On Thu, Nov 6, 2025 at 3:31 PM Tiffany Risucci

wrote:

Hi,

I'm writing to express a concern regarding an interaction I had earlier today at the Encino Recreation Center.

I was at the park with my dog, who was standing next to me, when I noticed a man taking photos of me. This immediately made me uncomfortable, as he wasn't engaging with anyone else and appeared to just be watching people play tennis. A few minutes later, he approached me, identified himself as Damian, and said he worked for the city and wanted to remind me that my dog needed to be on a leash. I immediately complied. I understand that dogs must be leashed in the park and I take responsibility for not seeing the sign.

However, the situation felt unsettling. The man wasn't wearing a uniform or a visible ID badge, so I wasn't sure whether he was actually affiliated with the city. To confirm, I called the number posted at the park. A man who answered refused to give his name and transferred me to his supervisor, Christian (I believe that was her name).

I explained that I wasn't trying to file a complaint, only to express that as a young woman alone, having an unidentified man take photos of me before approaching felt alarming. Unfortunately, the supervisor was extremely dismissive and spoke over me several times. She told me he was allowed to take photos, described unrelated issues at the park, and told me she has seen so much worse than I have. I left the conversation feeling unheard and even more uncomfortable.

I truly understand the need for enforcing park rules, but I hope this feedback can help ensure that enforcement is done in a way that feels safe and respectful for everyone. If staff are going to take photos or approach park visitors, it would be helpful if they clearly identified themselves with visible credentials.

Thank you for taking the time to read this and for helping make our neighborhood park feel safe and welcoming for everyone.

Sincerely,  
Tiffany Risucci

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

---

**Re: Alcohol Policy Pilot in Griffith Park**

1 message

**Rap Commissioners** <rap.commissioners@lacity.org>

Thu, Nov 13, 2025 at 7:38 AM

To: Gerry Hans

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners

On Fri, Nov 7, 2025 at 4:46 PM Gerry Hans

wrote:

Dear Board of Recreation and Park Commissioners,

Please see attached letter relating to the Revised Alcohol Policy pilot.

Respectfully,

Gerry Hans  
President<https://www.friendsofgriffithpark.org/>

--

City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640  
Fax: (213) 202-2610  
Mail Stop: 625/15  
Website: [www.laparks.org](http://www.laparks.org)





**Friends of Griffith Park**

P.O. Box 27573

Los Angeles, CA 90027-0573

[friendsofgriffithpark.org](http://friendsofgriffithpark.org)

November 7, 2025

Board of Recreation and Park Commissioners

Re: Alcohol Policy (Board Reports 23-085; 24-059) and Haunted Hayride

Dear President Renata Simril and Commissioners,

Friends of Griffith Park (FoGP) provided written and oral comments when the first draft of the Revised Alcohol Policy was presented in 2023. In 2024, a slightly modified policy was adopted. Again, FoGP provided in-depth comments with urgent apprehension. Our previous three letters are embedded below this current letter.

**Board Report [23-085](#), April 20, 2023**

The baseline **level of security personnel** provided under the proposed policy was a concern strongly voiced during the Board discussion. The Commissioners seated at the time decided to continue the item without approval due to the raised security concern.

**Board Report [24-059](#), March 7, 2024**

The amended proposed policy had a few, but important, changes versus the 2023 version:

- 1) it was declared a 2-year pilot,
- 2) it gave authority solely to the General Manager for declaring “open area events “ (not Superintendent level as in the 2023 version), and
- 3) it shifted the **decision on the level of security** to either the Chief Ranger and/or LAPD (versus only the baseline two security officers, with one extra for each additional 100 attendees per the 2023 proposed policy).

The topic of security in the two above Board Reports is extremely critical especially since FoGP learned - after the fact - that alcohol sales were initiated at the Griffith Park Haunted Hayride event the nights of Oct 17-19. This took place without prior knowledge by the public. There was zero outreach for public input, including Griffith Park Advisory Board and FoGP, which is particularly jarring given the clear sensitivity and importance of the issue of alcohol in the park.

Most shocking of all, Park Rangers and the Park Superintendent were not aware alcohol would be poured, nights which are already chaotic without adding liquor. Since the Policy provides that the Chief Ranger and/or LAPD decide the level of security, there

seems to have been an obvious failure of communication and failure to follow the approved policy.

Alcohol was served at the Haunted Hayride the following two weeks, as well. Advertisements from the official Instagram page suggest that alcohol was approved to freely flow for the entire duration of the season from October 24, onwards, making for 14 total nights of alcohol,

This lack of clarity and transparency is profoundly worrisome. We question:

- Were there sufficient qualified security officers or peace officers present at the event site itself?
- Were there enough officers present outside the venue when Halloweeners disperse to parking lots and beyond?

### **We Also Ask**

Can the income generated by alcohol sales at the Haunted Hayride event be worth the liability the City owns by allowing and promoting its consumption? Attendees walk quite a distance to their cars in parking lots adjacent to dry habitat, especially in the fall. Imagine if someone, under impaired judgement, lights up a cigarette?

Just as horrific, an impaired driver could cause an accident on a park road or in a dark parking lot, which may not be up to design and engineering standards which would otherwise avert or mitigate City liability. Such was the fate of bicyclist Andrew Jelmert, hit by an intoxicated driver on curvy Crystal Springs Drive in the park, which resulted in a large settlement amount made by the City to the victim's family recently.

An area of arguably even higher risk for alcohol service is the location of Independent Shakespeare Company (ISC) performances, completely surrounded by oak woodland, riparian, and chaparral habitat. Only one alcohol event evening took place this past season. However, this sounds the alarm, not because serving a glass of only wine during intermission on one night is risky, but that it may set a false precedent for alcohol service for this multiple-months series in 2026, perhaps beyond just wine. Worse, non-ISC events may be held in the future with less well-mannered attendees.

### **Annual Review?**

Has the mandated annual report been given by RAP staff per the Policy? If so, we missed it. Perhaps right now, even though overdue, is a good time to discuss the two-year pilot and the problems already apparent.

### **FoGP's Previously Stated Convictions Reiterated**

1. An unlimited number of "open-area events" is far too many. Prior to 2024, the Alcohol Policy allowed one event annually per park.



2. Alcohol “open-area events” should be prohibited within the defined “wilderness area” of Griffith Park where adverse environmental impacts and fire risks are heightened. The Alcohol Policy should not be one-size-fits-all. Griffith Park and other regional parks are unique.

3. Alcohol “open-area events” should not displace regular park patrons. *A Vision for Griffith Park*, adopted by the Commission in January, 2014 states, “Avoid Evicting or Displacing Established Park Users.” Currently, the Haunted Hayride effectively evicts picnickers for a quarter of the year, as inequitable as it is.

### **Summary**

The pilot-nature of this program necessitates some degree of community outreach and feedback about the duration and number of events in Griffith Park. This has not happened. We respectfully request further discussion on ways to better inform the public, keep park patrons safe, and protect the great urban wilderness of Griffith Park.

Sincerely,



Gerry Hans  
President

Cc: Councilmember Nithya Raman, Jimmy Kim, Mehmet Berker, Matt Rudnick, Brenda Aguirre, Stefanie Smith, Tracy James, Hannah Jaeger

### *About Friends of Griffith Park:*

*Friends of Griffith Park (FoGP) is a California non-profit 501(c) (3) dedicated to preserving and protecting Griffith Park's natural habitat, biodiversity, and historic features, for current and future generations. FoGP is committed to ensuring that Griffith Park, a public park and Los Angeles' largest Historic-Cultural Monument, remain open, natural, and free to all citizens of Los Angeles.*



**Friends of Griffith Park**

P.O. Box 27573

Los Angeles, CA 90027-0573

[friendsofgriffithpark.org](http://friendsofgriffithpark.org)

April 18, 2023

Board of Recreation and Park Commissioners

Re: Alcoholic Beverage Policy revision, Board Report 23-085

Dear Commissioners,

Friends of Griffith Park respectfully requests for a postponement and more public discussion of the revised Alcoholic Beverage Policy that is currently before the Board. Because of the short notice about this proposal, Friends of Griffith Park – along with other groups – would like additional time to consider the ramifications of this policy change more thoroughly; informing our members and volunteers will help us make appropriate comments about this policy change.

Please consider the obvious: alcohol is a sensitive trigger for the public. To approve a revision that, on the surface, expands sales to hard liquor at an unlimited number of open space events, without a full conversation with the public, could be misunderstood.

We fully understand that approvals for any open space event will continue to be highly scrutinized. Yet, every City park is different. A discussion of alcohol policy for open space events that potentially displaces existing park users or has possible adverse impacts in a defined wilderness area is worth the conversation.

Let's have that discussion, please.

Gratefully,

Gerry Hans, President

*About Friends of Griffith Park:*

*Friends of Griffith Park (FoGP) is a California non-profit 501(c) (3) dedicated to preserving and protecting Griffith Park's natural habitat, biodiversity, and historic features, for current and future generations. FoGP is committed to ensuring that Griffith Park, a public park and Los Angeles' largest Historic-Cultural Monument, remain open, natural, and free to all citizens of Los Angeles.*



**Friends of Griffith Park**

P.O. Box 27573

Los Angeles, CA 90027-0573

[friendsofgriffithpark.org](http://friendsofgriffithpark.org)

May 5, 2023

Jimmy Kim, General Manager  
City of Los Angeles Department of Recreation and Parks  
(email)

Re: Alcohol Beverage Policy Revision, Board Report 23-085

Dear Mr. Kim,

During the April 20<sup>th</sup> Commission meeting, Commissioners generously granted Friends of Griffith Park's (FoGP) request to postpone the approval of the Alcohol Beverage Policy Revision. Our verbal and written pleas for community outreach and transparency relating to the proposed policy changes are much appreciated. We thank the Commissioners for granting the postponement, a request also made by the Griffith Park Advisory Board.

FoGP has now closely considered the details of the policy revision, taking into account input from our constituency which holds Griffith Park in high esteem and recognizes the Park's value to people from across the City who enjoy it in many different ways.

Most provisions of the proposed Revision are acceptable to us; however, alcohol consumption can be a sensitive and volatile issue since it relates to public safety. This sensitivity is heightened when alcohol sales take place **on public property**. The provisions for security, insurance, containment, and licensing show that RAP considers the sale of alcohol in City Parks an extremely significant matter.

We respectfully seek a modification to proposed Section 1, pertaining to the **unlimited** number of public open area event approvals. We believe this provision is too broad to be applied to Griffith Park, despite the high level of scrutiny we'd expect from our Superintendent, the single person who would have complete responsibility for approvals.

Requests for approvals in Griffith Park could become more frequent should word circulate of a more liberal attitude toward open-air gatherings, conventions or celebrations. Why not have a wedding outdoors rather than inside at Friendship Auditorium? Companies might find it exciting to host their regional employee jamboree in a park setting.

Our concern for special events in open areas, particularly picnic grounds, is deep-rooted in FoGP's commitment to prevent existing Park patrons and historic user groups from being displaced, whether temporarily or not. This principle was upheld by the Griffith Park Master Plan Working Group, and distilled into text of *A Vision for Griffith Park*, adopted by the

Commission in January, 2014: “*Avoid Evicting or Displacing Established Park Users*,” where there is particular reference made about picnickers, since they have no advocacy group speaking specifically for them in Griffith Park.

**Our Recommendation:**

1. For Griffith Park, retain the limit on approved “public open area events” at the current level, one approved event per year, rather than having no number limitation.
2. No “public open area events” should occur within the “Wilderness Area,” as defined by Griffith Park Historic-Cultural Monument #942.

For clarity purposes, the Alcohol Beverage Policy would also be improved: 1) by defining an approved event as only a one-day event, 2) by specifying that open area events are allowed only during official Park visitation hours, and 3) by counting any event that spills over into open areas from a “special event venue” as an open area event.

The changes FoGP recommends are specific to Griffith Park, but may also be well-advised for other regional Parks, such as Elysian or Debs. RAP may consider listing other Regional Parks as exemptions to the revised provision regarding the number of open area events, as well, and retain the current limit of one per year.

As alcohol sales and revenue streams increase with more expanded event venues, a commensurate level of protections must be provided to ensure a safe recreational experience in our Parks. Equally important, preventing unintentional displacement to loyal Park users should be considered a top priority.

Sincerely,



Gerry Hans  
President

Cc: Board of Recreation and Park Commissioners, Councilmember Nithya Raman, Matt Rudnick, Brenda Aguirre, Stefanie Smith, Mehmet Berker, Jennifer Hull.

***About Friends of Griffith Park:***

*Friends of Griffith Park (FoGP) is a California non-profit 501(c) (3) dedicated to preserving and protecting Griffith Park’s natural habitat, biodiversity, and historic features, for current and future generations. FoGP is committed to ensuring that Griffith Park, a public park and Los Angeles’ largest Historic-Cultural Monument, remain open, natural, and free to all citizens of Los Angeles.*



**Friends of Griffith Park**

P.O. Box 27573

Los Angeles, CA 90027-0573

[friendsofgriffithpark.org](http://friendsofgriffithpark.org)

March 5, 2024

Board of Recreation and Park Commissioners

Re: Alcoholic Beverage Policy revision, Board Report 24-059

Dear President Renata Simril and Commissioners,

Friends of Griffith Park again respectfully requests postponement of the approval of these tremendously significant and radical changes to the Department's Alcoholic Beverage Policy.

Previously on April 20, 2023 we asked that the public be granted an active role in the acceptance of Alcohol Policy revisions. ([Board Report 23-085](#)),

After the former Commissioners agreed to postpone the approval from last April, FoGP submitted comments to the General Manager and Commissioners. **Our May 5, 2023 letter which follows below was an attempt to begin a dialogue.** Yet, ten months later, there has been no response to, or acknowledgement of our comments. Nor are we aware of any further outreach to Griffith Park Advisory Board or other organizations. The revised policy for open area events is an enormous step that may adversely affect the Park experience, with respect to not only recreation, but also safety and ecology.

**We recognize the changes made versus the April 2023 version. However, the two main edits are relatively minor, and offer no solace to our concerns:**

1. Included in the new version, only the General Manager can authorize an **unlimited number** of "open-area events" instead of assigning this role to another authority, namely Park Superintendents. This change in decision makers is not something that was requested, and will matter little.

2. Making the policy a "two-year Pilot Program," does not alter the fact that conditions for responsible use of Park land have not been defined within the Policy. We are especially concerned about wildlands, and would like to remind the commissioners that 800 acres burned in 2007, and Griffith Park sees an average of about a dozen fires per year.

There are also no conditions to discourage displacement of existing park users during "Open-area Events." Although no alcohol is permitted at the Griffith Park Haunted Hayride, this venue highlights one such example of an event that has grown dramatically, affecting picnickers in the historic Crystal Springs Picnic Area for four months out of the year.

In Section 2 (Location), while the General Manager can approve “events small gatherings,” within buildings that “cannot interfere with or disrupt the public’s normal use or enjoyment of the Department facilities,” the size of “open-space events” is totally undefined, as long as it is completely contained. Also, nothing in the language regarding disrupting of the public’s normal use or enjoyment in the “open-area event” is stipulated.

Relinquishing areas for commercial use cannot continue to occur on this free (and limited) public open space, especially in a Park that was gifted to the City with intentions set by Col. Griffith J. Griffith. We note the stated Goal #6 is to “Build Financial Strength and Innovative Partnerships,” yet there are no parameters defined for balancing income against the value of free open space for recreation.

**Every City Park is different. For Regional Parks, in particular, each needs to have its own set of guidelines for open-space events.**

A large portion of Griffith Park is delineated as “Wilderness Area.” If wilderness areas are not restricted from Alcohol Open-area Events, surely an environmental review is required in order to disclose and mitigate potential adverse impacts. While we have trust in the current RAP management, we stand with other Park advocates against sweeping policy changes that put the ecological health of wildlands at risk well into future decades.

As mentioned above, the following letter expresses our reasoning and the recommendations made on page 2. Above all, we request further review and discussion with the public.

Sincerely,



Gerry Hans, President

***About Friends of Griffith Park:***

*Friends of Griffith Park (FoGP) is a California non-profit 501(c) (3) dedicated to preserving and protecting Griffith Park’s natural habitat, biodiversity, and historic features, for current and future generations. FoGP is committed to ensuring that Griffith Park, a public park and Los Angeles’ largest Historic-Cultural Monument, remain open, natural, and free to all citizens of Los Angeles.*





Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

---

**Re: PPHS -Request\_ Palisades Park Building**

1 message

**Rap Commissioners** <rap.commissioners@lacity.org>

Thu, Nov 13, 2025 at 8:13 AM

To: DONNA VACCARINO

Good morning,

Thank you for contacting the Board of Recreation and Park Commissioners Office, your email will be forwarded to the Commissioners

On Wed, Nov 12, 2025 at 4:58 PM DONNA VACCARINO

wrote:

Dear RAP Commissioners -

Please read the attached letter and request from the Pacific Palisades Historical Society -

Thank you-

Sincerely,

Donna Vaccarino, President

Pacific Palisades Historical Society

--

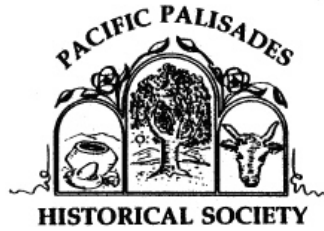
City of Los Angeles  
Office of the Board of Recreation and Park Commissioners  
Figueroa Plaza  
221 North Figueroa Street, Suite 300  
Los Angeles, CA 90012

Telephone: (213) 202-2640

Fax: (213) 202-2610

Mail Stop: 625/15

Website: [www.laparks.org](http://www.laparks.org)



*From the Mountains to the Sea*

[www.pacificpalisadeshistory.org](http://www.pacificpalisadeshistory.org)

November 11, 2025 – In Honor of Veteran's Day

**Board of Recreation and Park Commissioners, City of Los Angeles**

Renata Simril, President

Luis Sanchez, Vice President

Tafarai Bayne, Commissioner

Marie Lloyd, Commissioner

Benny Tran, Commissioner

Jimmy Kim, General Manager

Matthew Rudnick, Executive Officer

RE: Pacific Palisades Park Plan

Dear RAP Commissioners:

The Pacific Palisades Historical Society would like to request the opportunity of making a presentation to RAP Commissioners regarding the Historic Legacy of Pacific Palisades Park and the architectural significance of the existing Community Park Building.

The intact, Historic Park Building, which opened in 1950 was originally called the "Pacific Palisades Playground Clubhouse." This Community based, essential services building, is slated for demolition in a proposed Steadfast LA park redevelopment plan. The Pacific Palisades Historical Society, our Board and constituency are deeply concerned about the future of this building, and the important roll it has played in the Community for over 70 years. The Steadfast plan, eliminates the existing building and community based programs in favor of a new "Sports Center" four times the size of the current building. The Steadfast Plan and change of use has been presented without broad community discussion and proper CEQA review.

We support the concept of rebuilding a new "Gym," in place of the one that was destroyed in the January Fire, as long as that plan allows the existing Park Building to remain in its current location.

The Pacific Palisades Historical Society requests the opportunity to make a public presentation to RAP Commissioners to discuss the future of the Pacific Palisades Park, the Cultural and Historic significance of the existing building, and the continuing importance of a "gathering place" in our local park for community based programs, which provide diverse opportunities for engagement and enhance the quality of life for all.

Sincerely,

Donna Vaccarino, President

Randy Young, Vice President

Pacific Palisades Historical Society



Rap Commissioners &lt;rap.commissioners@lacity.org&gt;

**Re: Axolotls vs Royal Aces - All-Star selections**

1 message

**Connie Zapata** <connie.zapata@lacity.org>

Wed, Nov 12, 2025 at 5:20 PM

To: ivette garcia davila

Cc: rap.commissioners@lacity.org, Luz Perez &lt;luz.perez@lacity.org&gt;

Good afternoon,

Thank you for reaching out and for taking the time to share your concerns. We truly value your feedback and understand how important transparency and fairness are when it comes to our programs and All-Star selections.

All coaches had a fair opportunity to nominate players for consideration. However, it was communicated to all coaches that while nominations are an important part of the process, they do not guarantee selection to the All-Star team. We also want to clarify that the image of the All-Star roster that was circulated had been altered and unfortunately shared without our knowledge by someone, which caused misinformation and confusion, and did not reflect the official document. We sincerely apologize for any confusion or distress this may have caused to families or players.

To help ensure clarity moving forward, below are our guidelines and policy for All-Star selections at Chevy Chase Recreation Center:

**All-Star Selection Guidelines**

- Coaches may nominate 2 players from their teams for consideration. This is a nomination and not a selection to the all star team. This is made very clear to the coaches.
- The final selections are made collaboratively by the Recreation Coordinator and Facility Director.
- Players are evaluated based on skill level, sportsmanship, teamwork, and participation and effort throughout the season, in addition to character on and off the field. The same standards of respect, teamwork, and sportsmanship are expected from all players, families, and coaches throughout the tournament.
- We also take into account feedback from our sports program staff who regularly interact with the players during games, run clinics, and oversee classes throughout the season.
- Players must meet all Metro Region Sports Board Eligibility requirements.

Each team within a division must have at least 2 players represented on the All-Star team. While there is no fixed total number of All-Star participants per team (some may have more than two). Our selection process aims to ensure minimum representation for all teams, while still allowing flexibility for standout or stronger players to receive additional selections.

I have spoken with Luz, our Facility Director, and we have discussed how we can improve transparency moving forward. We are committed to doing our best to keep parents informed and to make the selection process as clear as possible. We understand that this process was not communicated as clearly as it should have been this season, and we sincerely apologize for the confusion and disappointment this caused. Moving forward, we will make every effort to be more transparent with parents and coaches about timelines, criteria, and the overall selection process to ensure that expectations are clear from the start.

We have two more games left in the season, and we are hopeful that we can end on a positive note for all our players. Our goal is to continue providing a positive, inclusive, and encouraging experience for all our athletes and families, and we appreciate your feedback in helping us improve.

Thank you again for your understanding and for being part of our community.

With appreciation,

--  
 Connie Zapata  
 Recreation Coordinator  
 Chevy Chase Recreation Center  
 City of Los Angeles  
 Department of Recreation and Parks  
 (818) 550-1453  
[connie.zapata@lacity.org](mailto:connie.zapata@lacity.org)

On Mon, Nov 10, 2025 at 1:20 PM ivette garcia davila

wrote:

Hi Connie,

Hope you're well. I'm following up on my initial email and looping in the Board of Recreation and Park Commissioners to hopefully help clarify the standard process in place for selecting All-Star players in the Chevy Chase Volleyball league, including where I can find information on the program's goals, eligibility, selection criteria, and procedures.

The way this year's selections were handled has caused a great deal of confusion and disappointment among several families. There was no prior notification regarding when selections would occur, who would make them, or what the specific criteria would be. Additionally, the selections appear inconsistent and arbitrary. For example, Coach Victoria's team had five players selected, while other teams—including my daughter's team, the Axolotls—had only three players each, despite comparable or stronger performance records. Furthermore, I understand that some coaches were allowed to choose players from their own teams while others were not given the same opportunity, raising concerns about fairness and consistency.

I'm honestly stumped here... Beyond the imbalance in numbers, the lack of transparency undermines the goals of inclusion, teamwork, and self-esteem that youth sports are meant to foster. I've attached a screenshot of the posted All-Star list, where one player's name was partially whited out—which was unprofessional and hurtful for the child.

We respectfully request that a clear, unbiased, and transparent selection process be documented and shared publicly to ensure fairness and accountability for all participants.

I hope to hear from you soon,  
Ivette



City of Los Angeles Department of Recreation and Parks  
ALL-STAR TOURNAMENT ROSTER



VR 58

Recreation Center: Chevy Chase RC

Sport: GPLA Volleyball

Division: Minors

Director in Charge Signature: \_\_\_\_\_

District Supervisor Signature: \_\_\_\_\_

\*This signature affirms that all players listed on this roster meet eligibility requirements.

Coach #1: Veronica Muroz Primary Phone: \_\_\_\_\_

Circle One: Staff ☐ Volunteer ☒

Coach #2: Valeria Orozco Primary Phone: \_\_\_\_\_

Circle One: Staff ☒ Volunteer ☐

Coach #3: \_\_\_\_\_ Primary Phone: \_\_\_\_\_

Circle One: Staff ☐ Volunteer ☐

SPORTS BOARD ONLY		
	Sportsmanship Certification	Code of Conduct
Coach #1	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Coach #2	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Coach #3	<input type="checkbox"/>	<input type="checkbox"/>

1. All JV or Varsity Players. 2. All players must have been in a common drill. 3. All players must have played in at least 50% of the league games.  
4. All players must have registered at this recreation center.

	PLAYER'S NAME (print)	PLAYER'S SIGNATURE	BIRTH DATE	SCHOOL	LEAGUE TEAM	SPORT	SPORTS BOARD ONLY				
							BC	BY	LB	WBC	
1.	Hero Brantley	Hero Brantley			Axolotls	AL					
2.	zephyr				Axolotls						
3.	Olivia Amundson				Axolotls						
4.	Charlie Dean	charlie Dean			Axolotls	AL					
5.	Ametia Leal	Ametia Leal			Royal Ace's	AL					
6.	Iana Zhigzhitova	Iana Zhigzhitova			Royal Ace's	AL					
7.	Chloe Bandari	Chloe Bandari			Royal Ace's	AL					
8.	Skyfar Holmes	Skyfar Holmes			Royal Ace's	AL					
9.	Sophia Barcena	Sophia Barcena			Aces	AL					
10.	Kate Zack	Kate Zack			Aces	AL					
11.	Billie Kloser	Billie Kloser			Aces	AL					
12.	Camila Ibarra				Royal Ace's						
13.											
14.											
15.											

\*If a recreation center has more than one facility in a particular division designate with a number or letter (ex. VNSO 1 & VNSO A2)

On Nov 8, 2025, at 11:22 AM, ivette garcia davila

wrote:

Hi Connie,

Hope all is well.

I'm writing to let you know the person keeping score at the game today spent a lot of time looking at her phone and a lot of us are certain she made a mistake keeping the score. Of course, I understand these things happen but it was unfortunately mishandled. The team deserved an explanation. Also, the All Star team pickings didn't go so smoothly and one of the girls was told she was in but then they were like, "oops, never mind. You're not." The selections also weren't substantiated by team's coach recommendations or by player's score or performance records. We felt there were some politics in play that didn't seem fair and would love some transparency as to how those choices are made.