



DEPARTMENT OF CITY PLANNING
RECOMMENDATION REPORT



CITY PLANNING COMMISSION

DATE: March 24, 2016
TIME: After 8:30 a.m.*
PLACE: Van Nuys City Hall
14410 Sylvan Street
Van Nuys, CA 91401

CASE NO:

CPC-2015-2328-CA-GPA

COUNCIL FILES:

CEQA:

ENV-2015-2329-CE

LOCATION:

Citywide

COUNCIL DIST:

All

PLAN AREAS:

All

PUBLIC HEARING REQUIRED

SUMMARY: A proposed ordinance amending Sections 12.21, 12.33, 17.03, 17.07, 17.12, 17.58, and 19.17 of the Los Angeles Municipal Code and a resolution amending the Public Recreation Plan of the Service Systems Element of the Los Angeles City General Plan to modernize the City's Park Fee (currently the Quimby and Finn fees) to mitigate park and open space impacts from residents of new residential projects.

RECOMMENDED ACTIONS:

1. **Adopt** the staff report as its report on the subject.
2. **Adopt** the attached findings in Attachment 1.
3. **Adopt** the Categorical Exemption (ENV-2015-2329-CE) as the CEQA clearance on the subject.
4. **Approve** the proposed ordinance (Appendix A) and recommend its adoption by the City Council.
5. **Approve** the proposed resolution (Appendix B) to amend the Public Recreation Plan, a portion of the Service Systems Element of the General Plan, and recommend its adoption by the City Council.

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ADVICE TO PUBLIC: *The exact time this report will be considered during the meeting is uncertain since there may be several other items on the agenda. Written communication may be mailed to the Commission Secretariat, 200 North Spring Street, Room 501, Los Angeles, CA 90012 (Phone No. 213/978-1300). While all written communications are given to the Commission for consideration, the initial packets are sent a week prior to the Commission's meeting date. If you challenge these agenda items in court, you may be limited to raising only those issues you or someone else raised at the public hearing agendized herein, or in written correspondence on these matters delivered to this agency at or prior to the public hearing. As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability, and upon request, will provide reasonable accommodation to ensure equal access to these programs, services, and activities. Sign language interpreters, assistive listening devices, or other auxiliary aids and/or other services may be provided upon request. To ensure availability of services, please make your request no later than three working days (72 hours) prior to the meeting by calling the Commission Secretariat at 213/978-1300.

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SUMMARY

This ordinance proposes to amend the general plan and zoning code in order to modernize fees, establish more flexible criteria for spending the collected fees, and encourage land dedication over payment where applicable. Abundant and accessible parks and open space are essential components of healthy and sustainable neighborhoods. Park and recreational facilities offer opportunities for physical activity, safe places for families and children, and spaces for social interaction. The Southern California Association of Governments (SCAG) Regional Growth Forecast estimates that the City will add significantly more people during the coming decades. It is necessary to acquire and develop new park and recreational facilities to serve the new residential population, and to maintain the existing service level. The current Park Fee Program comprised of Quimby and Finn Fees, is limited in many ways. This makes it challenging for the City to achieve the goal of providing new and much needed park space for residents city-wide. Current program constraints include: an outdated and ineffective fee structure, difficulties in appropriating expenditures of collected fees and not enough emphasis placed upon land dedication. As called for by a City Controller audit, five council motions, the recently adopted General Plan Health Element (“Plan for a Healthy Los Angeles”) and Mayor’s Sustainable City pLAN, the City’s Park Fee Program needs to be improved to better meet today’s needs.

STAFF REPORT

Initiation

The proposed ordinance was initiated in response to five Council motions, which directly or indirectly call for a reexamination of park fee policy (Council Files 05-1562, 07-3619, 07-3387-S2, 12-1000-S2, 12-1178-S2).

Background

The following two ordinances and the Public Recreation Plan comprise the historic foundation of the Quimby and Finn Fee Programs.

Los Angeles Quimby Ordinance

Stemming from a 1965 state law, the City’s Quimby regulations require developers to dedicate land or pay an in-lieu fee as a condition of subdivision map approval. The fundamental concept behind this legislation is that new development brings in more residents, thus placing additional strain on the community’s existing infrastructure of parks and public spaces. The fees and/or land dedication collected via the Quimby ordinance mitigate this impact by providing park and recreational facilities to serve the new residents. The City’s Quimby regulations were adopted under Ordinance 141,422 in 1971. The fees assessed vary by residential zone density, and are adjusted annually by the Department of City Planning (DCP).

Los Angeles Finn Ordinance

In 1985, park fees were also extended to market-rate, multi-unit residential projects which require a Zone Change. Known as the Finn Fee for the City Councilman who introduced it, this fee is collected and administered in the same manner as Quimby fees. The fees assessed vary by residential zone density, and are adjusted annually by DCP.

Public Recreation Plan

The Public Recreation Plan, a portion of the Service Systems Element of the City's General Plan, provides recreational definitions, standards, and policies, emphasizing neighborhood and community recreational sites for the City. The Public Recreation Plan includes park level of service standards (park acreage per 1,000 residents) for community and neighborhood recreational sites and also specifies the distances from a residential project for expending Quimby and Finn fees (service radius), which the proposed ordinance and accompanying resolution modify.

In February of 2008, the City Controller released an audit of fees collected pursuant to the Quimby ordinance, detailing various shortcomings with the program. Several issues could be traced directly to the City's policies and codes, including that Quimby and Finn Fee funds can only be expended within a one-half mile and two mile radius of the development that generated the fee.

On the same day as the audit, the Mayor directed the Department to "take the lead in updating and drafting a revised Quimby ordinance." In addition, three 2007 City Council motions directly called for a reexamination of park fee policy:

- Council File 07-3619, 11/7/07 (Hahn/Reyes): Instructed DCP and the Department of Recreation and Parks (RAP) to revise the credits for on-site recreational amenities in the Quimby ordinance to reflect current construction costs.
- Council File 07-3387-S2, 11/7/07 (Hahn-Rosendahl): Called for the Housing Department, with input from the Department of Recreation and Parks (RAP), to develop a park fee to be applied to new market rate apartments and condominium conversions.
- Council File 05-1562, 11/28/07 (Smith/Garcetti/Hahn): Instructed DCP, in coordination with RAP and the City Attorney, to determine the feasibility of expanding the service radius within which Quimby funds can be spent.

Subsequently, a combined RAP and DCP working group researched and discussed these issues and began developing a draft revised Quimby ordinance to address issues with the program (approximately 2009-2012). Due to limited staff resources, this work program was delayed until sufficient funds were allocated for the project.

In 2015, DCP resumed the work program which included an assessment of the existing park fee ordinances and the open space standards and policies contained in the Public Recreation Plan of the Service Systems Element of the General Plan. The project

included the creation of a Park Advisory Committee (PAC), conducting stakeholder outreach, and completing technical analysis. More detail can be found in the Outreach and Proposed Ordinance sections of the staff report.

Key Issues

The following is an analysis of the primary issues that have been raised concerning the City's existing Quimby/Finn Fee regulations. The issues include: 1) an outdated fee structure; 2) limited fee expenditure ability; 3) a lack of land dedication; and 4) potential impacts of cumulative mitigation fees.

1. Existing Fee Structure

Outdated Fees

Although the current Quimby and Finn Fees are updated each year to account for inflation and market changes, they are still considerably out of date and do not accurately reflect present land values or park development costs.

Only Some Housing Types Pay Fee

Park fees only apply to for-sale subdivision development (Quimby) and to multi-unit residential projects -including rental- requiring a zone change (Finn). However, residents of rental apartments have a need for park space just as those living in new condos or apartment developments that require zone changes. Moreover, while Quimby and Finn Fee funds currently go only to areas with subdivision developments, expanding park fees to all multi-unit residential development would expand public space benefits to a greater range of communities.

Fee Deferral Loophole

Currently, under the Quimby Program, a deferral of all park fees may be granted for subdivision projects that achieve either of the following scenarios: (1) If the project is financed in whole or in part by federal funds and owned and operated by an entity qualified as an exempt organization under Section 501(c)(3) provided that the project is occupied entirely by low and moderate income households or housing to be occupied by persons over the age of 62 or persons who are handicapped. (2) If the development is a rental project comprised of at least 20% low or moderate-income residential units. Projects must also be financed in whole or in part by bonds or other securities issued by the City. In each instance, a contract must be made with the City that the units designated for low or moderate income households will be available for rental for a 10 year period. Currently, the City's affordable housing programs, including the density bonus program, require covenant lengths of 55 years.

The purpose of the deferral of park fees is to incentivize the construction of affordable housing, by not burdening affordable housing developers with more costs. This is intended to incentivize the construction of more affordable housing. In order to receive

the deferral of park fees, a developer is only required to create 20% affordable units for an entire project. As such, most developers only provide the minimum required 20% affordable units and are not motivated to provide any additional affordable units. Even through meeting the minimum requirements, developers are able to defer Quimby fees for the entire project, which includes the market rate portion of the project. An additional consideration is that the United States Department of Housing and Urban Development (HUD) views fees on affordable housing as an impediment to affordable housing production and may deduct points from grant applications in cities that do not provide exemptions.

2. Limited Expenditure Ability

Service radius

Currently, Quimby and Finn Fee funds must be spent within a service radius of one-half mile if allocated to a “neighborhood park” or within a service radius of two miles if allocated to a “community park” as defined in the City’s Public Recreation Plan. The service radius is the geographic area whose population the park serves. A neighborhood park is intended to serve the immediate neighborhood, while the larger community park serves several surrounding neighborhoods.

The highly restrictive service radius mandate has resulted in the City’s limited ability to use the Quimby/Finn funds it has accumulated. This is especially the case in densely populated areas like downtown Los Angeles, where significant Quimby money has been collected but high land costs and scarce available land for new parks have proven severely limiting.

Qualifying Parks and Facilities

The Public Recreation Plan defines neighborhood, community, and regional parks. However, the Plan only specifies radius standards for neighborhood and community parks and is silent on regional park radius standards. This limits the City’s ability to use the park funds for regional-serving recreational facilities, such as the Los Angeles River or regional greenways.

The Public Recreation Plan also identifies the types of facilities typically provided at these recreational sites (examples include shuffleboard, table games and lawn games just to name a few). This list of facility types is dated and out of context for an urbanized city. In addition, the current prescribed list of facilities does not provide the City with the needed flexibility to respond to community-driven and place-appropriate facilities such as community gardens and trails.

3. Lack of Land Dedication and Park Access

Although State and local Quimby regulations allow for park land dedication to be required for subdivision projects with 50 or more units, the vast majority of developers elect to pay the in-lieu fee rather than dedicate land. Land dedication for Park Fee program compliance is not typically considered as part of the initial feasibility analysis for a

development project. Generally, developers opt for paying the in-lieu fee because it is more cost effective and logistically easier. By providing the City with the funds, the developer is relieved from the obligation of finding an adequate site and funding the construction, needed amenities, and maintenance of new park and open spaces.

Furthermore, by the time Quimby fees are paid it is often too late in project design to consider land dedication. In turn, through in-lieu fees, the developer is relieved from the onus of meeting the demand for park space created by the project and passes it on to the City who will undoubtedly face the same challenges.

Credits for On-Site Recreational Amenities

The current Quimby regulations award credits for on-site park and recreational amenities. Credit is granted dollar-for-dollar at \$5/square foot for "high intensity" recreational areas and \$2.50/square foot for "low intensity" recreational areas. These credits have not been revised since 1981, and no longer provide a meaningful incentive for developers. The credits are rarely utilized by developers due to the outdated dollar amounts which do not correspond to current construction costs. In addition, the set of amenities specified is limited. These amenities reflect the suburban context for which Quimby was originally envisioned, but are not as well suited to the urban infill context that is more typical of developments today.

4. Potential Impacts of Cumulative Mitigation Fees

The impact of multiple development fees is an area of concern expressed by a number of stakeholders. The Department is currently considering how to address a variety of goals and policy objectives for the City as a whole, in particular the need for affordable housing. Aside from the City's scarcity of available park space, a critical issue felt citywide is the lack of housing available for low income populations. Proposed assessments used to develop affordable housing are intended to partially offset affordable housing development costs through new fees on commercial and residential development projects.

At the time of preparation of this staff report, the Department has just released a Request for Proposal (RFP) for the preparation of a feasibility study which will recommend a fee structure and assess its potential impacts. The study will also provide an analysis of the financial impacts that both fees collectively (park fee and affordable housing linkage fee) may pose. Once the results of this study are made available, decision makers will have a clear understanding relative to the maximum linkage fee amounts developers may feasibly absorb.

It is anticipated that the proposals will be received at the end of March with a tentative study completion date of August 2016. Since this effort is in the early stages, there is no estimate of proposed housing fees and therefore insufficient information to evaluate the potential impacts of charging the developers two separate linkage fees (park linkage fee and affordable housing linkage fee).

Proposed Ordinance

To address the aforementioned key issues, staff recommends the following Zoning Code and General Plan changes.

Modernize Fees

In order to more accurately reflect present land values and park development costs, the current Quimby fee must be increased, and a new impact fee be assessed for non-subdivision projects. The increased fee would be phased in to allow a gradual period of adjustment for new development.

Additionally, the ordinance proposes that the following unit types be exempt in order to support city policy seeking to increase housing units:

- Restricted Affordable Units which are units made affordable to those earning up to 120% of the Area Median Income (AMI) and are covenanted for 55 years to be affordable. This exemption supports an urgent need to address the housing affordability issues in Los Angeles.
- Secondary Dwelling Units (SDUs) built on single family lots. Development of these units provides additional housing capacity consistent with City policies. While legal to build today, the provisions regulating secondary dwelling units are proposed to be further updated in order to remove obstacles and encourage their broader development. Including this provision in the proposed ordinance therefore supports broader citywide policies aimed at encouraging the creation of such units.

In addition, the proposed ordinance would eliminate the deferral of park fees for market rate projects that include affordable units. The current regulations that allow full deferral of park fees for market rate units is not effective and counterproductive to the park fee program. The exemption of affordable units provides sufficient incentive through the park fee program for the development of affordable housing.

In order to develop the recommendation regarding fees, an impact fee study and feasibility analysis were conducted. These studies are included in Attachment 3 and 4 respectively. The purpose of the Park and Recreation Site and Facility Fee Study (Fee Study) is twofold. First, it documents the technical analysis and nexus findings to support a citywide impact fee on non-subdivision residential development. Second, the Fee Study documents the necessary technical analysis to increase park and recreation site and facility impact fees for residential subdivision projects. The existing Quimby In-Lieu Fee and Finn Fee, though updated each year to account for inflation and market changes, are still considerably out of date and do not accurately reflect present land values or park development costs.

The City also completed a financial feasibility and sensitivity analysis of a proposed revised Quimby Fee on residential subdivision developments, and a proposed new Park

Impact Fee that would apply to non-subdivision projects. The analysis measures the financial feasibility of adding the maximum justifiable revised Quimby and new parks fee to a base-case development budget for each of several prototype developments, and then lesser increments of fee amounts per unit, and measuring the changes in specific financial feasibility indicators.

Through the Fee Study, a maximum justifiable fee of \$18,364 was identified as the amount per unit necessary to maintain the current 4.2 acres of park space per 1,000 people in the City. The Financial Feasibility Analysis concluded that a reduced fee from the maximum, \$12,500 for residential subdivision projects (Quimby in-lieu fee) and \$7,500 for residential non-subdivision projects (Park Impact Fee), was feasible based upon the maximum amounts that could be absorbed by project type across submarkets in the City.

In light of the consideration of additional mitigation fees, including a potential affordable housing linkage fee, the Department proposes a more modest Park Fee increase. Under this structure, a maximum of \$10,000 would be charged for residential subdivision projects (Quimby) and \$5,000 for residential non-subdivision projects (Park Impact Fee). Reserving the final one third of the fee provides a buffer for future mitigation fees to potentially coexist with Park Fees.

Over the next two years decision makers will have more information relative to the cumulative effects of establishing additional impact fees. The City Council would have the ability to revisit the practicality of establishing the final year park fee installment at that time. In addition, the studies recommended an exemption for units covenanted to be affordable at 120% or lower AMI. The Financial Feasibility Analysis also outlined a recommended approach to annual inflation adjustments.

Appropriate Expenditure

In order to address issues related to the City's ability to expend park fees that have been collected, the proposed ordinance and resolution would increase the fee spending radii from the site from which the fee was collected, as well as broaden strict and outdated terms defining parks.

Increase Radii

There are three types of parks outlined in the Public Recreation Plan of the Service Systems Element: neighborhood, community, and regional. Below are the current and proposed radii that determine the distance from the fee source site in which a park may be built:

PARK TYPE	CURRENT	PROPOSED
Neighborhood	½ mile	1 mile
Community	2 miles	5 miles
Regional	Undefined	10 miles

The radius for the neighborhood park type is proposed to be extended to one mile because of the need to reduce barriers to expending monies, while balancing the priority to provide parks within walking distance of all residents in the City of Los Angeles per the Mayor's Sustainability pLAN. The radius for community parks is proposed to be increased from a distance of two to five miles to similarly extend the reach and ability to expend collected fees. Lastly, the radius for a regional park was previously undefined which left the City unable to contribute toward such sites with Quimby in-lieu fees. With this introduction of a radius comes the ability to improve major destinations within ten miles of a project site.

The State Quimby Act requires that there is a "reasonable relationship" between the fees and the land dedicated. The proposed radii respect this requirement. It is reasonable to expect that a resident would travel one, five, or ten miles, depending on the park type, from their home to a park built with monies collected from the development where that person resides.

Broaden Terms

The proposed resolution seeks to remove strict language that has bound the City from expending monies in ways that address modern needs. The current language is dated and calls for specific facilities such as tennis courts. By removing this language, the Department of Recreation and Parks has increased flexibility in how parks are built.

Encourage Land Dedication and Park Access

In order to create more opportunities for land dedication in an effort to increase park land, the ordinance calls for a predevelopment meeting and an update to the credit structure.

Early Consultation

The proposed ordinance requires applicants of residential subdivision projects with 50 or more units to have a meeting with staff prior to filing an application in order to identify means to dedicate land for park space. Currently, the project approval process addresses Quimby requirements toward the end of project approval, which makes it unrealistic to expect a developer to be able to dedicate land or provide parkland on private land. This meeting will bring together relevant staff from DCP, RAP, and the respective Council District at the appropriate time to discern what opportunities are available for parkland dedication or creation. The meeting can be satisfied through the existing predevelopment meeting that many projects of this size already conduct as a part of the normal development review process.

Update Credits

Under the current Quimby Program, credits are issued to developers who dedicate park land within a subdivision. The dedicated recreational space is credited toward the land dedication requirement and the payment of in lieu fees for a residential development.

The current credit structure allows for credits of \$5.00 per square-foot and \$2.50 per square-foot depending upon project location. In addition, the current credit program is specific relative to the types of amenities that must be provided. This disincentivizes the developer from providing the necessary on-site amenities.

In order to revise the credit system to be more effective, the proposed ordinance allows for a credit of up to 35% of the calculated requirement for park fees or land dedication for private park and recreation facilities. If such facilities are publicly accessible, the credit can be for up to 100%. These credits only apply to dedicated park space which is covenanted for such uses and which exceeds the amount otherwise required by code. Expanding the current credit system will aid in the creation of more park space.

Other Related Modifications

AB 1191 Implementation

State law, AB 1191, effective January 1, 2016, clarifies how interest generated from Quimby in-lieu fees can be used and identifies a process by which those funds can be committed to developing new or rehabilitating existing park and recreational facilities. The proposed ordinance includes language that enables the City to expend interest monies provided that the park and recreational facilities comply with the principles and standards set forth in the General Plan.

Greater Downtown Housing Incentive Area Ordinance

On September 23, 2007, Ordinance No. 179,076 became effective, establishing the Greater Downtown Housing Incentive Area (GDHIA) as a means of encourage housing production within downtown Los Angeles. This ordinance contains a variety of incentives, including one which allows residential and/or mixed use buildings containing the requisite number of Restricted Affordable Units to receive a Floor Area Bonus along with incentives for reduction in open space and parking requirements. In addition, the ordinance allows for a 50% reduction in the required open space if an in-lieu-fee equivalent to the Quimby fee is paid. The Parks Fee Ordinance clarifies that the GDHIA in-lieu-fee is distinct and independent from the Quimby fee. Thus, if a GDHIA in-lieu fee is paid, that payment will not take the place of a required Quimby fee. In addition, the Parks Fee Ordinance exempts 100% affordable housing developments in the GDHIA from the Quimby Fee or Park Impact Fee.

PUBLIC HEARING AND COMMUNICATIONS

The following is a summary of the comments received since the draft Ordinance was publicly released on October 1, 2015.

- New fees will translate into higher for-sale and rental prices.
- Higher fees deter new residential construction, thereby further exacerbating the housing crisis.
- Existing Quimby dollars in City coffers should be utilized. No new fees.
- Increase park service radii. Radii used to determine where Quimby funds can be spent is too small. Expanding service radii will increase number of potential park sites.
- Ordinance should exempt workforce housing units as workforce housing has been identified as an important below market rate option for downtown housing.
- There needs to be some language in the ordinance which promotes equity through prioritizing park space in park poor neighborhoods.

Policy Advisory Committee

The City convened an advisory committee to provide feedback and guidance in informing the recommendations around park fees, land acquisition, and geographic flexibility for where resources can be expended. Organizations and individuals were identified because of specific expertise, the role an organization plays around the issue, and the important perspective an individual could represent about improving access to parks or residential development. The advisory committee included the following organizations:

Alliance of River Communities
Building and Industry Association
Bureau of Engineering: LA River
California Apartment Association
Central City Association
Department of Public Works
Department of Recreation and Parks
Housing and Community Investment Department
Los Angeles Alliance of Neighborhood Councils
Los Angeles Chamber of Commerce
Los Angeles Neighborhood Land Trust
Los Angeles Unified School District
National Resources Defense Council
Prevention Institute
South Los Angeles Alliance of Neighborhood Councils
Southern California Association of Non-Profit Housing
The City Project
The Community Health Councils
Trust for Public Land
Valley Alliance of Neighborhood Councils
Valley Industry & Commerce Association

The Policy Advisory Committee met three times, as follows:

Meeting 1 (June 24, 2014): The purpose of this meeting was to provide background information on the existing ordinances for park fee, land dedication, and park distribution, and to define the key issues in revising the way that park fees are collected and spent. Twenty-six people attended the meeting.

Meeting 2 (October 2, 2014): The purpose of Meeting 2 was to provide an overview of the preliminary direction to address key issues related to park fees and land dedication, and to solicit feedback on the preliminary direction for revising park fee programs. Highlights from the Final Draft White Paper were also discussed. Twenty-five people attended the meeting.

Meeting 3 (June 9, 2015): This meeting provided an overview of key planning and policy documents including the Impact Fee and Land Dedication Ordinance, Public Recreation Plan, and draft Recreation and Park Department Board policy. Technical analysis on revised park and recreation facility fees was presented.

Stakeholder Interviews. A series of stakeholder interviews were conducted at the beginning of the process. Interviews included members of the Los Angeles Neighborhood Land Trust, Trust for Public Land, Housing and Community Investment Department, Building Industry Association, and Department of Recreation and Parks.

Stakeholder Meetings. The City participated in numerous calls and meetings with the Los Angeles Neighborhood Land Trust, the City Project, the Arts District Business Improvement District, the Central City Association, the Los Angeles Chamber of Commerce, the Valley Industry and Commerce Association, and the Building Industry Association.

CONCLUSION

The need for increasing accessibility to park space within the City is a priority highlighted throughout the General Plan and various City policy documents. Although there are currently programs in place, which center around the goal of park space creation (Quimby Fee and Finn Fee), there continues to be a shortage of park space to service many of our communities. This is in part due to the various limitations discussed above which are associated with the structure of the current programs, including: an outdated and ineffective fee structure, difficulties in appropriating expenditures of collected fees and not enough emphasis placed upon land dedication for park development.

The proposed new Parks Fee Ordinance aims to increase the opportunities for park space creation by removing the aforementioned constraints while also expanding the program beyond those projects requiring a subdivision map to include a park linkage fee for all net new residential units. This will ensure that all residential project applicants pay a share of the cost of acquiring, developing, and improving park and recreation facilities with the purpose of providing recreation space for new and existing residents within a community.