

Sharon Dickinson - Legislative Assistant
PLANNING AND LAND USE MANAGEMENT COMMITTEE
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Los Angeles, CA 90012

Sent via Email to Sharon.Dickinson@lacity.org

August 30, 2016

Re: 16-0529, Agenda Item #6

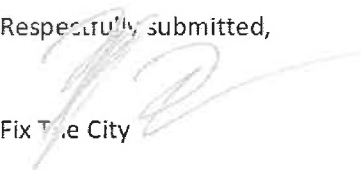
We write today to comment on Council File 16-0529 (CPC-2016-2583-GPA), Item 6 on the agenda.

We strongly recommend that the council require evidence of thorough public outreach on this matter. Neighborhood councils have not been informed and neither have Park Advisory Boards.

Further, we provide the following observations:

- The proposed change goes far beyond the state law and may be in conflict with the metrics required by state law. The City should avoid making the same mistake it did with SB-1818, with that mistake being corrected by the courts.
- Specifically, diversion of funds from areas with insufficient park space per capita to any other area is improper. A recent report on per capita park space can be found here:
http://publichealth.lacounty.gov/chronic/docs/Parks%20Report%202016-rev_051816.pdf (“Within the City of Los Angeles...Council Districts 5, 8, 9, 10, and 13 all had less than 1.0 acre per 1,000 population.”) Additional documentation can be found at these links: [2016 Parks Report](#), [Palms](#), [Venice](#), [West LA](#), [WLA Unincorporated](#)
- The proposal is silent on the status of funds already in the Quimby system which have been specifically allocated to parks within a radius of already approved and/or developed projects. Diverting funds that have already been allocated within the radius of a project is improper, lacks in transparency and retroactively makes previously approved projects’ environmental findings invalid. In addition, developers may be unhappy to learn that Quimby fees paid will likely not be used in the vicinity of their project as required at the time their fees were paid.
- Specifically, the proposal fails to account for Quimby funds that were specifically designated as mitigation for local park impacts. For example, many projects contain mitigation language consistent with the following:
“New residents generated by onsite development would increase the use of existing neighborhood and community parks and recreational facilities, which could cause or accelerate physical deterioration of the facilities. However, with payment of required Quimby fees and/or Recreation and Park fees and the provision of required onsite open space, impacts to parks and recreational facilities would be less than significant.”
- There has been no outreach to neighborhood councils or park advisory boards that funds which had previously been dedicated to local parks may be syphoned off to park projects 15 miles away.
- No EIR was prepared as a categorical exemption was used. The proposal has a substantial likelihood of impacting the environment as funds are used up to 15 miles away from where they originated. Some areas of the city may receive less environmental benefit than under the current usage guidelines. In fact, this is the stated purpose of the proposal.¹
- The proposal fails to address the growth-inducing aspect of exempting a class of projects from fees. The proposal also fails to address the per-capita reduction in park facilities which will occur as project classes are exempted.
- The proposal makes nor requires any of the required findings as provided in state law.
- Charter section 555 details how the General Plan may be adopted and amended. All amendment to the General Plan must be proposed by either the Council, the City Planning Commission, or the Director of Planning. Council file 16-0529 indicates it was initiated by the CAO and Mayor.

Respectfully submitted,



Fix The City

GPA Initiation

Title

Public Recreation Plan / General Plan Amendment / City Park Fees (Quimby and Finn Fees) / Ordinance

Date Received / Introduced

08/17/2016

Last Changed Date

08/29/2016

Expiration Date

08/26/2018

Time Limit

11/02/2016

Last Day To Act

11/02/2016

Pursuant To

Los Angeles Municipal Code

Reference Numbers

Cases: CPC-2015-2328-CA-GPA; CPC-2016-2583-GPA

Related Council Files: 05-1562; 07-3387-S2; 07-3619; 08-0449; 12-1178

City Attorney Report R16-0200

Pending in Committee

Planning and Land Use Management Committee

Initiated by

City Administrative Officer
Mayor



Direct document links:

http://publichealth.lacounty.gov/chronic/docs/Parks%20Report%202016-rev_051816.pdf

http://www.fixthecity.org/docs/Parks_Report_2016-rev_051816.pdf

http://www.fixthecity.org/docs/Toolkit_Palms_-_Mar_Vista_-_Del_Rey_-_Presentation_Boards.pdf

http://www.fixthecity.org/docs/Toolkit_Venice_-_Presentation_Boards.pdf

http://www.fixthecity.org/docs/Toolkit_WEST_LOS_ANGELES_-_Presentation_Boards.pdf

http://www.fixthecity.org/docs/Toolkit_Westwood_Unincorporated_Sawtelle_VA_Center_-_Presentation_Boards.pdf