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October 14, 2025

Jessica M. Henson
Project Director,
Los Angeles Park Needs Assessment
Olin Partnership, Ltd.

Jimmy Kim
General Manager,
Los Angeles Department of Recreation and Parks

VIA EMAIL

RE: Draft Los Angeles Park Needs Assessment (PNA)

To Whom It May Concern:

At a regular public meeting on **October 14, 2025**, the Board of Directors of the Downtown Los Angeles Neighborhood Council ("DLANC") voted to provide the following comments below:

The Los Angeles Park Needs Assessment (PNA) presents a pivotal opportunity to reimagine and establish a sustainable roadmap for the city's investment, management, and vision for parks and recreation facilities across every neighborhood of Los Angeles.

As one of the fastest-growing communities in the city with an anticipated 100,000 new housing units by 2040,¹ Downtown Los Angeles (DTLA) faces unique challenges. Increasing density and population have intensified demand for accessible open and green spaces, creating significant equity concerns. Historically, investments and planning in DTLA's parks and recreation facilities

¹ Press Release: "DTLA New Zoning Code," Los Angeles City Planning, December 4, 2024, https://planning.lacity.gov/odocument/92b97b24-1978-4e0e-9eae-51f22eda9e4c/Press%20Release_%20DTLA%20New%20Zoning%20Code.pdf

have often fallen short of addressing the distinct needs of this dense urban environment, which includes a diverse demographic ranging from young families to vulnerable populations transitioning from homelessness.

DLANC commends OLIN and the consultant team for recognizing high-need park facilities such as Gladys Park and San Julian Park in the Skid Row community, and for prioritizing the “Per Square Mile—Downtown” area for potential park development. Building on this foundation, we offer the following recommendations to enhance the PNA’s analysis and better address DTLA’s unique park needs:

1. Park Maintenance Investment & Staffing:

Consider further outlining and providing projections related to park maintenance staffing levels across the entirety of the Department of Recreation and Parks (RAP) service areas to ensure that parks are maintained at a consistent level of service in every neighborhood and for every park type. Ensuring this level of equity in maintenance is critical across both geography and park typologies throughout the city. While precise staffing numbers may be difficult to quantify, the use of general staffing metrics and benchmarks may assist RAP and other City departments in identifying priority needs and addressing the critical staffing challenges the Department is currently facing, including attrition, understaffing, and an aging workforce. Although staffing allocations are subject to external pressures, including the City’s Civil Service system, Personnel Department, Elected Officials, and the City Administrative Officer, we recommend establishing a baseline staffing level to guide the Department toward realistic full-time hiring goals and to prevent continued erosion of staffing capacity. A stable and adequately resourced maintenance workforce is essential to the long-term care, functionality, and sustainability of park assets throughout Los Angeles.

2. Park Security & Safety:

Consider further outlining and providing recommendations for the expansion and staffing of the Park Ranger Division as part of the long-term strategy to address park safety across all of RAP’s portfolio of facilities. The Los Angeles Police Department (LAPD), while a key partner in ensuring public safety, continues to face significant resource constraints and competing citywide priorities. As such, LAPD is unable to fully commit to the ongoing security needs of park facilities. In this context, the Park Ranger Division remains a critical resource for public safety at city parks and should be equipped with the personnel, infrastructure, and support needed to fulfill this role. We also recommend that PNA include recommendations to expand Ranger staffing levels and explore the creation of satellite Ranger facilities in urban areas, by way of potential co-location within existing RAP or City properties, particularly in Central and East Los Angeles. We also support the consideration of strategic, rotating patrols that include smaller park facilities in addition to regional parks.

In parallel, we ask that the PNA project team explore and provide recommendations for expanding alternative safety models, including the Park Ambassador program, modeled after Metro's Transit Ambassador Program, which can provide a non-law enforcement presence at park facilities to enhance safety, improve wayfinding, and support conflict de-escalation. This model can also serve as a force multiplier alongside Park Rangers, contract security, and other City public safety resources to balance the resource needs and unique safety considerations in certain communities of the city.

Finally, we urge the PNA to further emphasize the need for RAP to implement comprehensive strategies to address difficult issues such as open-air drug use at parks in a manner that is compassionate, trauma-informed, and balanced to ensure safe and equitable access for all park users, including children and families. Strengthening public safety infrastructure and presence at parks is essential for ensuring that all Angelenos feel welcome and protected in public spaces, regardless of the neighborhood in which they live.

3. Financing for Park Creation & Maintenance:

Consider further expanding the discussion of alternative funding models, including Tax Increment Financing (TIF), Enhanced Infrastructure Financing Districts (EIFD), and the Transfer of Floor Area Rights (TFAR) Public Benefit Payment program as important tools to support future park development and investment. These mechanisms can provide more flexible alternatives to Community Facilities Districts (CFDs), which can be difficult to implement due to voter approval requirements and added tax burdens. These funding tools should serve as supplements, not replacements, to existing sources such as Quimby fees and other Development Impact Fees, which remain essential to park creation and capital improvements across the city.

TFAR has played a key role in DTLA by capturing value from new development to fund community benefits including parks. We recommend the PNA explore opportunities to better integrate TFAR dollars into RAP's sphere of consideration, with a focus on directing future funds to address unmet park needs in underserved, high-density neighborhoods like Downtown.

We also encourage support for new bond measures modeled after Proposition K, which provided critical citywide funding for park expansion and enhancement. As existing facilities age and deferred maintenance challenges increase, especially given ongoing financial pressures on RAP, stable and sustainable funding sources will be critical to meeting current and future demands. The PNA should also recommend ways to streamline and coordinate funding across City departments, helping to reduce the financial burden on RAP and ensuring the Department has adequate resources to address the needs of growing and evolving communities throughout Los Angeles.

4. Privately Owned Public Spaces (POPS):

The PNA should study and analyze the role of [Privately Owned Public Spaces \(POPS\)](#) and the Los Angeles Department of City Planning's (DCP) new requirements for such spaces under the Downtown Los Angeles Community Plan. While POPS can help ease the City's burden to maintain and develop public open spaces and contribute to livability in dense urban neighborhoods like DTLA, there remain significant concerns. These include limited access for the broader public, potential exclusion of users who are not residents or tenants of the associated private developments, and challenges in enforcement and ensuring ongoing compliance by private owners.

We strongly encourage the project team to include recommendations that RAP work closely with DCP to establish baseline oversight of POPS. It is critical that the existence of POPS does not become a substitute for the development and sustained investment in publicly managed parks and recreation facilities, especially in neighborhoods with clear park deficits such as Downtown Los Angeles. The PNA should emphasize that POPS complement but do not replace the City's responsibility to provide accessible, equitable, and well-maintained public park space for all residents and visitors.

5. Creation Recreation Center & Active Recreation Facilities in DTLA:

As DTLA continues to grow, the need for publicly managed recreation centers and active recreation facilities, such as playing fields and courts, has become increasingly apparent. Currently, DTLA lacks these essential amenities, which creates accessibility challenges for residents and other community members. While some luxury and high-end residential buildings may offer these features privately, there is a critical need for public facilities that serve the broader constituency.

Additionally, the community faces a shortage of accessible assembly spaces to hold meetings and host events outside of privately managed venues. Therefore, we urge the PNA project team to prioritize the investigation of Recreation Center creation in DTLA within the PNA. We also recommend that RAP emphasize incorporating active recreation components in future park developments to enhance the park experience and reduce the need for residents to travel outside their neighborhood for basic recreational amenities.

6. Completion of Existing Park-Related Capital Improvement Projects in DTLA:

The enhancement and modernization of Pershing Square and the proposed [First and Broadway Civic Center Park Project](#) (FAB Park) represent significant missed opportunities to expand public spaces and provide key community amenities in Downtown Los Angeles. Challenges related to competing project scopes, budgets, and a clear vision by RAP have hindered progress. The decision to halt bidding on the FAB

Park construction and the subsequent reallocation of funds to other facilities has resulted in a vacant site primarily used for film production staging and overflow event parking adjacent to Gloria Molina Grand Park.²

We strongly recommend that the PNA explore ways to address these stalled projects and consider including the FAB Park site in RAP's potential future park. Furthermore, we urge RAP and the Bureau of Engineering (BOE) to assess the feasibility of relaunching FAB Park with a simplified scope, favoring passive features over complex architectural elements, to help realize the project.

Pershing Square faces similar challenges. Inconsistent funding and competing visions for the park's functionality have limited its ability to meet community needs or serve as a true civic square for all Angelenos. The use of the park as a parking and concert venue, rather than a recreational facility, has created barriers to consistent community access and benefits. While modernization efforts are underway, including Phase 1b and 2 projects, it is crucial that RAP and BOE balance programming needs so the park remains accessible for public art, civic assembly, markets, festivals, and everyday use. We urge the PNA to recommend restoring arts programming at Pershing Square in collaboration with the Department of Cultural Affairs, enabling more low-cost activations.³ Additionally, the PNA should explore strategies to balance private events, such as concerts, with community needs to avoid long closures that limit park access.

Lastly, we ask that the PNA study how RAP can prioritize and dedicate resources to ensure that current capital improvement projects are completed fully and funded adequately for both construction and long-term maintenance. While building new or enhanced facilities is important, ongoing maintenance must remain a top priority for the sustainability of park assets citywide

7. Potential Public Park Development Sites in DTLA:

The "Per Square Mile – Downtown" recommendation in the draft PNA offers an exciting opportunity to address the community's strong desire for additional public parks in Downtown Los Angeles. Neighborhoods with significant residential growth and limited open space, such as the Fashion District and South Park, have long been identified as priorities for future park development.

In the Fashion District, which continues to see rapid growth and is one of DTLA's most diverse neighborhoods, the 0.6-acre city-owned parcel at 749 South Los Angeles Street ([APN 5145001900](#)) has been identified as a potential future park site. This parcel currently contains a subterranean LADWP electrical substation and has historically been used as a parking lot, but remains locked and underutilized. Due to constraints on residential or commercial development caused by the substation, many community

² Steven Sharp, "Another setback for 1st & Broadway Park in DTLA," *Urbanize LA*, February 15, 2023, <https://la.urbanize.city/post/another-setback-1st-broadway-park-dtla>

³ Erica Evans, "'Liquid Shard' art installation makes waves in Pershing Square," *Los Angeles Times*, August 6, 2016, <https://www.latimes.com/local/lanow/la-me-ln-liquid-shard-20160804-snap-story.html>.

groups have advocated for this site's conversion to public open space. Given the parcel's public ownership, it represents one of the most feasible opportunities for park development in the area without requiring the acquisition of private property. DLANC's "[Vision Downtown](#)" plan, with support from AECOM and SCAG, specifically identified this parcel as a key site for potential development.⁴ We recommend that the PNA explore this site as a potential future RAP park development option.

South Park, one of the densest residential neighborhoods in Downtown, remains park-poor despite significant growth. Previous efforts by the now-dissolved Community Redevelopment Agency in the 1970s to develop park space were limited, with the creation of Grand Hope Park in the 1990s serving as a partial consolation.⁵ In September of 2024, [Council File 24-113](#) was introduced to explore the development of 1051 South Grand Avenue as a potential park site to meet community open space needs.⁶ While acquisition costs remain a concern, we encourage the PNA team to investigate this opportunity for future park development in South Park.

DLANC appreciates the opportunity to provide feedback on the Draft PNA and looks forward to continued collaboration to ensure that Downtown Los Angeles's parks and recreation facilities grow equitably, sustainably, and with the community's diverse needs front and center.

Sincerely,

SUBJECT TO APPROVAL BY DLANC BOARD OF DIRECTORS ON OCTOBER 14, 2025

Jens Midthun
President,
DLANC

Heera Kapoor
Chair,
DLANC Livability Committee

Cc: Board of Recreation and Parks Commissioners (via email)
Council District 14 (via email)

⁴ See page 87 in, *Vision Downtown*, prepared by AECOM with funding from the Southern California Association of Governments (SCAG), November 2021 (PDF), <https://dlanc.com/wp-content/uploads/2021/11/VisionDowntown.pdf>

⁵ Rich Connell, "A Dream Delayed: Ambitious Residential Plans for L.A.'s South Park in Jeopardy," Los Angeles Times, April 10, 1985, <https://www.latimes.com/archives/la-xpm-1985-04-10-me-7509-story.html>

⁶ Thomas Curwen, "Despite Its Name, South Park Is Park-Poor. That Could Change," Los Angeles Times, November 1, 2024,

<https://www.latimes.com/california/story/2024-11-01/despite-its-name-south-park-is-park-poor-that-could-change>