

# Water Collaborative of Greater New Orleans

Comments to the New Orleans City Planning Commission on Master Plan Amendment Submissions, Jan. 2017

## **Vol. 2 Ch. 1 – Office of the Mayor**

We welcome the Mayor's suggestion that resilience be a cornerstone of the Master Plan. The objective of "transform[ing] city systems" to build a New Orleans for the future is particularly relevant to the Master Plan and its use by city agencies. If the plan is to be transformational rather than merely aspirational, however, all agencies and not merely the CPC must integrate the policy goals found in the plan into daily operations and coordinate with sister agencies on cross-cutting goals like resilience and equity.

## **Vol. 2 Ch. 5 – Housing NOLA**

In addition to weatherization and energy efficiency, the scope of assistance to low-income residents referenced in goal 2.A.2 should include household water efficiency and onsite stormwater management whenever practical, as these measures also achieve occupant cost-savings and net energy savings.

We support the inclusion of stormwater management as a legitimate use for undeveloped parcels as proposed in goal 2.A.4.

We concur with the assertion under goal 4.G that "sustainable design principles should ensure that all residents have access to a healthy living environment that efficiently uses resources over time and reduces the potential for flood damage from rainfall events."

The reauthorization of the National Flood Insurance Program referenced in goal 4.G.3 is necessary but not sufficient; the objective of "more affordable" flood insurance should always be paired with the objective of maximizing coverage. It is in the city's best interest to remove barriers to comprehensive coverage so that all homes and businesses are adequately covered in the event of a flood, non-flood storm damage, or other event. This principle (which is perhaps implied, but not articulated) should also be clearly reflected in goal 4.G.4. We concur with the language in goal 4.G.4 calling for the city to pursue an improved rating under the NFIP Community Rating System, which entitles all residents to a discounted flood insurance rate.

## **Vol. 2. Ch. 6 – Office of the Mayor/HDLC**

We support the altered recommendation in goal 3.A to "Develop a 'Resilience Strategies for Historic Commercial Corridors' pattern book," as this concept is compatible with our own recommendations for revisions in this section. We note that a pattern book should adequately explain the principles and best practices reflected in the designs included. This will make it more widely applicable. Similarly, a companion book or appendix on residential neighborhoods would be useful for many residential property owners and developers.

The Water Collaborative would welcome inclusion in the committee described in 3.A.1, which is similar in concept to our own proposal for a public-private advisory committee.

### **Vol. 2. Ch. 6 – Louisiana Landmarks Society**

We support the Louisiana Landmarks proposals for sections 3.C and 3.D, which are similar in concept with our own and compatible with the “pattern book” concept cited above. Each of these related proposals envisions the city as a national model for resilience retrofits that are informed by experts, embraced by community members and made clear to the owners and redevelopers of historic property.

### **Vol. 2. Ch. 7 – ENONAC**

Maps provide by the East New Orleans Neighborhood Advisory Commission’s underscore the fact that New Orleans East lacks lakefront recreational access. Recognizing the complexities of the project, we nevertheless regard Lincoln Beach as a priority site for re-establishing connectivity with Lake Pontchartrain. This objective is also affirmed in comments from the Office of the Mayor.

While ENONAC’s request for park creation and improvement in New Orleans East emphasizes programmed spaces such as ballfields and playgrounds, this subsidence prone area is also well suited to pocket parks following NORA’s “stormwater lot” model, which emphasizes water management, education and passive recreation.

### **Vol. 2. Ch. 7 – NOLA Squared**

We welcome the inclusion of stormwater management and sustainability as criteria in park restoration plans in 7iB-3. The consideration given to low-maintenance plant materials in 7iC-2 should be expanded to preference native plants, which are adapted to local climatic conditions.

### **Vol. 2. Ch. 7 – Sustaining Our Urban Landscape**

We support the suggestion that the city establish a heritage tree designation and explore a compensatory mitigation program for trees lost to development. These proposals are similar in concept to several of our own recommended amendments.

### **Vol. 2. Ch. 7 - Councilmember Cantrell - NOLA Parks for All**

We concur that establishing sub-designations for open space, natural areas and recreational areas can improve the management of public lands within the city. Recognizing that parks provide a range of ecosystem services and social benefits, those responsible for managing our parks should seek to balance these outcomes across the city’s “fleet” of small parks and within its larger park parcels.

We endorse the suggestion that decisions to reprogram public lands in a manner that restricts access to public waterfronts (goal 5) should be subject to heightened scrutiny. This is in keeping with our emphasis on improving the public’s access to and appreciation of the city’s waterfronts and waterways.

### **Vol. 2. Ch. 7 – Office of the Mayor**

While we recognize that not every neutral ground or right-of-way is well suited to green infrastructure, we oppose the removal of the reference to “stormwater management” under goal 2 unless the concept is reintroduced elsewhere. It may be acceptable to decouple the installation of green infrastructure for stormwater management from tree canopy restoration. However, there is a strong case for linking green infrastructure and neutral grounds and rights of way: these linear parcels are the most practical means of intercepting the large volume of runoff generated by city streets.

We support the introduced goal 7.C of “Establish[ing] green infrastructure planting practices and staff resources for green infrastructure in public spaces” through a “comprehensive manual for use by city departments and the general public” and “green infrastructure maintenance team(s) with specialized training to manage and develop green infrastructure elements on public lands.” In addition to those agencies listed, nonprofits like the Water Collaborative and trade associations such as the Water Environment Federation and American Society of Landscape Architects may be able to contribute positively to the manual through creation of a stakeholder advisory group. It is also worth noting that in addition to establishing teams of city staff, the responsible agencies may sometimes determine it cost effective to enter maintenance contracts for green infrastructure with private sector providers.

#### **Vol. 2. Ch. 9 – Office of the Mayor**

We support the suggestion that “environmental and resilient industries” be listed as emerging industries, as this reflects our suggestions. The edited goals 5.A – 5.D constructively spell out the steps needed to realize the city’s aspirations for water sector growth. They rightly synthesize coastal restoration and urban water management, and we particularly welcome goal 5.A.1 “Fully implement the Greater New Orleans Urban Water Plan as recommended in the Resilient New Orleans strategy.” Regarding the timeframe for this goal, it should be understood that it is a near-term priority but will not be completed in five years.

#### **Vol. 2. Ch. 10 – Office of the Mayor**

We support the assertion that “city facilities must set the standard for resilient design, use, and operation,” and concur with the rationale provided.

*Note:* Relatively few edits have been proposed to this chapter by the administration. Consistent with the steps outlined in the “City Planning Commission Universal Amendment Proposals,” we recommend a review of the “fact sheet” data by Sewerage and Water Board. In particular, references to the board’s consent decree with the U.S. EPA, estimated repair costs and available funding in the Capital Improvement Plan appear dated.

#### **Vol. 2. Ch. 11 – Office of the Mayor**

We support the added goal 5.B (as renumbered): “Develop a transportation system that contributes toward a healthier environment for future generations through investments in multi-modal facilities and green infrastructure for stormwater management.” This is imperative because (a) the mostly-paved transportation network is a major contributor of stormwater runoff to the drainage system and (b) the adjacent rights of way and neutral grounds, which provide alternate receiving areas for stormwater, are typically managed in tandem with the transportation network.

For these reasons, more detail is warranted under goal 5.B.3, “Implement stormwater management systems that emphasize green and gray infrastructure solutions.” This could be achieved in part by reference to other passages of the Master Plan dealing with green infrastructure for stormwater management.

#### **Vol. 2 Ch. 11 – Central City Renaissance Alliance**

The proposed strategy, “Fund neighborhood projects to implement low cost redesign solutions for varied purposes – parklets, bike shares and calming traffic,” is compatible with the goal of improved

stormwater management adjacent to roads and sidewalks. For example, replacing painted “no parking” triangles with planting beds can achieve traffic calming at intersections while also reducing runoff. Use of permeable paving options for bike lanes, parking lanes and sidewalks is another such strategy.

#### **Vol. 2 Ch. 11 – Port of New Orleans**

The Port’s proposed revised strategy, “Ensure that the City’s hazard mitigation plan and preparedness and response measures are coordinated with the Port, rail and regional freight planning efforts to efficiently and safely move hazardous materials through the city,” calls attention to an important issue: The potential for an unintended release of toxic materials within neighborhoods or waterways. We support this proposal with the additional observation that in some cases, minimizing (in time or volume) the movement of hazardous materials through our city may be the safest option.

#### **Vol. 2. Ch. 12 & 13 – Office of the Mayor**

This extensive revision appears largely concurrent with our own recommendation that the *Greater New Orleans Urban Water Plan* and *Resilient New Orleans* strategy be incorporated into the next iteration of the Master Plan. We have endorsed many of the strategies and actions presented in this document in our own amendments and comments above.

Goals 3 and 4 emphasize citizen preparedness for climate change and extreme events. However, goal 2 pays minimal attention given to the impact of private lands on stormwater volume and water quality (only addressing private lands through the CZO). This is important, because the *Urban Water Plan* calls for distributed green infrastructure on private, residential lots. Additional actions should be included to drive retrofitting of private property for system-wide benefit. These include exploring the viability of a drainage fee or stormwater utility and creation of low-interest revolving loan funds for qualifying retrofits. This may be what is intended for the grant program referenced in 3.A.1, but if so the phrase “risk reduction measures,” should be augmented with details.

Proposed goal 6.B.2, “Design and implement green infrastructure interventions to improve water quality,” is the only reference to water quality, and it lacks specificity. This omission should be addressed in the final document, and our own amendments provide some language.

We also support the parenthetical call, “For increased usefulness across the Master Plan document, include metric targets for each goal wherever possible.

#### **Vol. 2. Ch. 12 – Sustaining Our Urban Landscape**

We support the policy, also reflected in our own amendments, of identifying and protecting “heritage trees” in concert with the installation of green infrastructure for stormwater management across the built environment.

## Paul Cramer

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**From:** CPCInfo  
**Sent:** Monday, January 09, 2017 9:04 AM  
**To:** Paul Cramer  
**Subject:** FW: Public Comment on Master Plan Amendments

**From:** Patrick Armstrong [mailto:patrick.n.armstrong@gmail.com]  
**Sent:** Sunday, January 08, 2017 11:45 PM  
**To:** CPCInfo  
**Subject:** Public Comment on Master Plan Amendments

January 8, 2017

Director Robert Rivers  
City Planning Commission  
1300 Perdido Street, 7<sup>th</sup> Floor  
New Orleans, LA 70112

RE: Master Plan Amendments

Good morning, Director Rivers and members of the City Planning Commission,

My name is Patrick Armstrong, and I'm a resident in Mid-City in New Orleans. I am writing to you as an individual, and the views below are my own and do not represent the views of any organization of which I am a part.

First of all, I would like to thank CPC Staff for the outstanding job they have done hosting public meetings, getting the proposed amendments uploaded to City websites so that they are easy to find online, and especially for Ms. Leslie Alley and Mr. Paul Cramer for attending the Mid-City Neighborhood Organization meeting in November to help demystify the Land Use map changes proposed for Planning District 4. I also would like to thank the staff for the hours of work they have undoubtedly put into the Master Plan amendment process.

That said, with 300+ proposed amendments to the New Orleans Master Plan, many of which are confusing to read and several that are redundant, there are a number of issues among the amendments I simply won't be able to address. As a private citizen, I have limited free time to dedicate to community engagement activities. While I do my best to remain informed and keep up with public policy and city decision making, the sheer volume and scope of these amendments as proposed has been impossible.

When I voted for the Master Plan to have the force of law back in 2008, I did not envision 300+ significant amendments for each revision process, and this experience has been very discouraging to me as a citizen that the public input process will truly be considered in good faith. What is the purpose of having a Master Plan with the force of law if every single thing about it can change every five years, with a volume of amendments so large that even this city's most engaged citizens cannot possibly read through them all? That does not strike me as best practice for good city planning.

To that end, I hope many CPC staff recommendations will be to either deny outright or significantly delay the more sweeping changes until more of the public has a chance to read, understand, and comment on these amendments. The Master Plan took a lot of work and considerable community engagement to create and finalize. Sweeping changes should not be the order of business for this amendment process.

For myself, I've identified the following Text Amendments and Map Changes to focus on. These are not all the changes I have concerns about, but they are the most significant that I could find and comment on within the public comment period.

Text Changes to Chapter 15: As I understand this amendment, much of the Neighborhood Participation Program will be moved into the auspices of the Neighborhood Engagement Office. While I have enormous respect for the staff in Neighborhood Engagement and know they work hard to fulfill their mission, I am against expanding their portfolio to cover the NPP and Community Engagement processes. They are simply too small an office and the NPP process is too large with many moving parts. To me, this would only set Neighborhood Engagement up to fail and undermine the already difficult to engage NPP.

I firmly believe the city should enact the District Councils called for in Chapter 15 as currently written, to help citizens better understand land use and zoning issues and how they affect cost of living and quality of life.

Councilmember Jason Williams' proposal to amend the Master Plan Land Use Map so that wide swaths of the city from Mixed Use Low Density (MUL) to Mixed Use Medium Density (MUM). I find these changes far too significant in terms of scale and effect to be an appropriate part of the Master Plan amendment process. The wide-ranging result of these proposed changes should require far greater public input than has currently been seen.

Additionally, for the Mid-City area, several parts of the neighborhood are already mapped for MUM, and many of the areas already mapped MUL were done so to reflect existing development patterns. In effect, many of these areas were already remapped MUL, upzoned, involve allowances for larger scale, more intensity, more density, and significantly reduced parking minimums for commercial uses. While there may be reason to make these changes in certain areas, I do not believe wholesale changes from MUL to MUM is justified.

Request Numbers PD-4-7, PD-4-18, and PD-4-48 also involve moves from either RDL-Pre or MUL to MUM. I have concerns regarding these changes for many of the same reasons listed above. There are simply so many areas that were remapped and upzoned already that have many uses in the zoning underneath, and I believe each of these changes represent significant consistency issues with regard to existing development patterns.

Text Changes Proposed by the Music and Culture Coalition of New Orleans (MACCNO). I am in strong support of these proposals. Based on what I have read from these amendments, they will do a great deal to protect New Orleans' cultural traditions and institutions against the pressures currently building that could undermine the widespread performance spaces used for music, artistic, or other cultural purposes.

Text Changes Proposed by Ride New Orleans. I am generally in strong support of these proposals, with the significant exception of any change that directs much higher density land uses around transit corridors. We do need strong transportation alternatives in New Orleans, to make sure our citizens have access to first class transit to get around the city and metro area. Buses and streetcars should arrive on time and with shorter waits between rides, with fewer transfers and more robust stations where transfers are conducted. That said, New Orleans development patterns are already consolidated around many transit lines. Not only that, but transit lines can be moved, and several probably should be to deliver better services to those citizens who do not live in the "hot" neighborhoods that are already well-served by transit.

General Text Changes to Land Use Map Definitions. This part of the amendment process has been the most difficult to get a handle on, because many proposals affect the same definitions in different ways. I was unable to wade through all the text amendments, or itemize them successfully. I'll just state some general thoughts:

- I have significant concerns about any change that makes HU-MU a consistent use in low density, primarily residential areas. I believe the commercial intensification represented by such changes will be detrimental to residents' quality of life and cause land values to rise and price more people out of their neighborhoods.
- If there were a way to encourage lower-density multi-family residential uses that remained on a neighborhood scale and did not come along with tremendous density bonuses or commercial intensification, I would love to see a way to do that. I am in support of Councilmember LaToya Cantrell's proposed amendment PD-4-12 to support the Jane Place Neighborhood Sustainability Initiative, because that development is a neighborhood scale, multi-family density that promotes permanently affordable housing.
- That said, I realize remapping areas to Residential Medium Density Pre-War (RMD-Pre) can potentially be used to bring tremendous increases in density that become out of scale with surrounding low density areas. It is a shame that the only way to go from Residential Low Density to Residential Medium Density or Multi-Family

seems to involve allowing out of scale density or further commercial intensification. I think finding an appropriate middle ground would go a long way to solving several of New Orleans land use issues.

Because there are so many Master Plan amendments, and the process will include a back and forth between CPC and the City Council, I may have additional thoughts on these items as the process moves forward. I appreciate your continued consideration of my comments.

Thank you for all that you do.

Sincerely,

Patrick Armstrong

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