

TRANSIENT LODGING STUDY

INCLUDING COMMERCIAL SHORT-TERM RENTALS

City of New Orleans, La - City Planning Commission

DESIRE LINE

December 2025



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Prepared by:

CITY PLANNING COMMISSION

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TRANSIENT LODGING STUDY

PRELIMINARY REPORT

City of New Orleans, Louisiana – City Planning Commission

OCTOBER 2025

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1. Foreword

We are in a unique and highly contentious environment related to transient lodgings uses, especially for Commercial Short Term Rentals (CSTRs). Many factors have led to this point, including: (1) an initial, highly impactful citywide permissive approach to Short Term Rentals that spurred a significant shift in the built environment and a suite of economic opportunities for locals and out-of-towners alike, (2) followed by waves of new regulatory amendments and clarifications in response to resident and neighborhood concerns, (3) followed by entrepreneurs and investors renovating building stock and creating tourism opportunities citywide, (4) followed by neighborhoods and locals feeling the effects of higher costs for housing and commercial spaces, as well as a loss in community character and quality of life. The expansion of STRs over the last 15 years, and the strain and stress associated with the growth and restriction of these land uses is expressed in Study data, background and spatial analysis; as well as in 1,261 survey responses, 21 stakeholder interviews, and 6 focus groups completed as part of this Study.

In the first six months of this Study, the goal of the work was established: To develop policy recommendations for CSTRs and other transient lodging uses that balance the need to safeguard neighborhoods and permanent housing opportunities, preserve and enhance the tourism industry, create opportunities for business growth, and support business sustainability. Throughout the Study, three core objectives emerged:

1 Develop policy recommendations that can be implemented by City staff and understood by all (the community and transient lodging operators), and that can be practically applied within a short period of time.
2 Base recommendations on the need to protect community character by openly and consistently acknowledging the fact that transient lodgings uses, at their very core, include managing whether temporary or long-term occupants are permitted to occupy an area and in what form.
3 Balance the protection of community character with reasonable land use permissions that promote economic opportunity, when that economic opportunity is unlikely to have negative impacts.

These objectives—when the Study began—seemed at odds with each other…but as the Project Team worked with City staff, stakeholders, and members of the public—both together and separately—a clear and comprehensive approach to managing transient lodging uses became more apparent. This approach is summarized within the Executive Summary to take the mystery out of next steps.

The Study started with a challenging, detailed, and burdensome background and data analysis (**Appendix A**). A core finding of this analysis was that measuring the impacts of transient lodging uses is challenged by both (1) major disruptions in citywide permitting from repeated cyber security hacks, and (2) the fact that transient lodging land uses—while prevalent in the environment and understood by all in some form or another—have not been captured and consistently monitored in nationwide, state, or local datasets.

Despite the City's efforts to fill data gaps, the picture of what transient lodgings uses are and how the public interacts with them was notably missing critical information and community input, so the Team took the time and effort to launch and advertise a project website and a community survey, host stakeholder meetings, and conduct interviews to not only fill in gaps in understanding, but also to collect very important information and context from residents' and business owner's lived experience citywide. What we found was that residents and business owners alike have been stressed by the

changing regulatory environment associated with transient lodging uses over the last 15 years, and also by the global COVID pandemic, increased rates of localized flooding, and rising insurance costs.

The Team is very grateful to all who participated in this Study. Many may wrongfully assume that we received a lot of strongly worded letters attesting to the value or hurtful effects of STRs, and that these narratives—being so at odds most of the time—couldn't possibly support a comprehensive approach to addressing these uses. While we did receive many responses wholly at odds with each other—these letters and conversations revealed very meaningful and important insights driving local perspectives. These insights were shared at all stages of the Study, as the Team left the "engagement door" open, so to speak. For all those who called, attended a meeting, sent an email, took the survey, or shared information about this Study—*thank you.* This Study is a better product because of your time and effort, and we appreciate your patience as we worked through and did our best to respect and incorporate all public input.

Together—with City staff's support on background and data gaps, and the public's generous offering of their time and insights—the following findings and recommendations are presented.

Alexandra Carter, AICP
President & CEO, Desire Line

2. Executive Summary

1. *A changing regulatory environment.*

   It is notable that, over the Summer of 2025, the City Council directed additional resources towards addressing noncompliant STRs, which has resulted in an 88% decrease in noncompliant STRs between March and August 2025. This significant change took place after the Study's background and analysis elements were complete and during the Study public engagement period. This prompted the Team to re-analyze the nature and extent of noncompliant STRs citywide in August, delaying initial release dates for the Study in August and September, as planned. While the Project Team did not perceive a change in public opinion towards or perception of STRs while engagement efforts were underway, the shift in the number of noncompliant STRs during the period was significant.

   If this management approach is maintained, it could cause a significant change in the perception and effect of STRs in the built environment over time, and prompt a re-evaluation of recommendations presented herein. This is accounted for in next steps in a hypothetical sense because during the course of the Study the effect of these changes were not able to be fully measured and understood, and may take years to fully manifest.

   The regulatory environment continues to change as the Study wraps up. On October 29, 2025, the City Council unanimously passed Motion M-25-530, which put into effect a new Interim Zoning District (IZD) to allow more time for the City Planning Commission, City Council, and the public to review the results of this Study. The Transient Lodging Interim Zoning District requires conditional use approval for all transient lodging uses in zones where they are permitted for a period of one year. This conditional use requirement includes Bed and Breakfasts, Commercial Short Term Rentals, Hotel / Motels, Hostels, and Timeshares.

2. *Key findings.*

   a. The continued growth in STRs—despite the continuation of legal cases, interim zoning standards, and platform reforms—suggests that they are very likely to continue to locate where they are permitted.

   b. Because transient lodging uses change the demographics of an area, they can contribute to a significant loss in community character if they overly saturate the area.

   c. Limiting the overconcentration of CSTRs in particular will protect community character by (1) preserving existing long-term housing units, (2) limiting land use speculation and potential increased building costs, and (3) protecting commercial spaces that sustain the city's small- and micro-business base, which altogether enable "thriving, mixed-use urban centers" consistent with the goals of the City's Master Plan.

   d. Regulation of transient lodging uses also could be improved with more specific definitions and an established methodology for when, where, and why these land uses are permitted across the city's residential, mixed-use, commercial/entertainment, and special zoning districts.

   e. The City's existing zoning district framework is complex, where unique districts, development patterns, and use standards provide a sufficient mechanism to regulate transient lodging uses citywide. While sufficient, the city's zoning district framework—due

to the level of detail and specificity that is broadly applied citywide—will continue to be difficult to track, manage, and comprehensively regulate transient lodging uses without comprehensive updates.

f. Absent comprehensive updates to this regulatory framework, temporary or overly burdensome administrative measures, such as Interim Zoning District (IZD) standards and conditional use permitting processes, have been put into place to prohibit Commercial Short Term Rentals, and to limit transient lodging uses' impact on neighborhoods that abut or include residential districts or uses.

g. When assessing the impacts of current transient lodging use standards and permissions, the conditions of existing federal, state, and local datasets, as well as significant outside factors such as the COVID pandemic's impact on tourism trends have made targeting analysis on specific transient lodging uses (such as CSTRs) challenging. To address this, the City established a Working Group, comprised of internal City experts, to examine fluctuations in data and address data-related questions and concerns. The City further undertook extensive community outreach and engagement efforts to supplement Study considerations with community input and stakeholder insights.

h. When survey respondents were asked what the City should focus on when updating rules for CSTRs, they provided the following feedback:

    - 72.8% - Stopping the operation of illegal CSTRs.
    - 62.6% - Preserving housing for people who live in New Orleans all year.
    - 59.2% - Keeping neighborhoods residential.
    - 57.3% - Limiting the development of future CSTRs.

i. When breaking down survey respondents by owner and non-owner cohort, and upon review of survey "free responses," defense of compliant CSTR operators was a central theme, specifically "don't punish the CSTR operators who follow the rules," one respondent stated, urging the City to "shut down the illegal operators and properties" instead. These legal operators, they argue, "are not the bad guys here" but rather contribute significantly to the local economy "through property taxes AND [sic] occupancy taxes." Their goal, they say, is not disruption, but to "share the city with all our visitors."

j. A simple solution (such as an outright ban or a broad approval of transient lodging uses) will not resolve divergent perspectives and land use conflicts amongst owner and non-owner cohorts.

k. A reasonable compromise is needed, based on: (1) streamlined and consistent definitions and use standards; (2) use permissions that reflect zoning district purposes as well as development patterns and community input; (3) density limitations that serve an immediate goal to limit the over-concentration of CSTRs and Bed and Breakfasts (as a potential loophole), and (4) more by-right use permissions for appropriately sited and scaled transient lodging uses citywide.

3. *Recommendations.* To support public health, safety, and welfare, a thoughtful and deliberate rebalancing of the city's previous permissive approach to CSTRs is recommended, including:

    a. Reclassifying Commercial Short Term Rentals and Hotels / Motels into categories that better reflect their land use impacts. It is recommended that CSTRs are further defined as

"Small, Medium, or Large" and Hotels/Motels are further defined as "Neighborhood or Large." New definitions create opportunities to permit less intense uses in zoning districts where impacts are minimal, and close loopholes where CSTRs may currently operate more like a Hotel or Bed and Breakfast without having to meet the building code or retain an operator on site 24/7.

b. Streamlining all transient lodging use standards and limiting the Commercial Short-Term Rental and Bed and Breakfast density citywide. Where:

   - No more than one Bed and Breakfast may be located on a City block. This limitation applies across all Bed and Breakfasts and NSTRs, where no more than one (1) of these uses may be permitted per block.
   - No more than one Commercial Short-Term Rental may be located on a City block. This limitation applies across all CSTR-Small, CSTR-Medium, and CSTR-Large(s), where no more than one of these uses may be permitted per block with the exception of the CBD Districts, EC, MC, MS, and LS Districts.

   Density limitations acknowledge Bed and Breakfasts and CSTRs are appropriately permitted within residential and commercial/mixed-use zoning districts (respectively) and can contribute to the tourism industry at appropriate densities provided they are not overrepresented in the built environment. Limitations on transient lodging use density (specifically NSTRs and CSTRs) were consistently advocated by community members as a tool to protect neighborhood, commercial, and mixed-use areas.

c. Formulating proposed zoning district amendments on the following analysis and considerations:

   - First, all transient lodging uses were comprehensively aligned with the City's existing residential, mixed-use, commercial, entertainment, and special districts based on the purpose and function of each zoning district. For example, residential uses like Bed and Breakfasts were aligned with residential districts, commercial uses like CSTRs were aligned with mixed use and commercial districts, and Hotels / Motels were aligned to commercial and industrial districts.
   - After this initial alignment, the existing development pattern across citywide neighborhoods and underlying zoning districts was considered to isolate opportunities where changes to a zoning district in one area may have adverse impacts on another area. These areas were flagged for continued, ongoing awareness.
   - Finally, community engagement informed final recommended land use permissions, where heightened community concerns and the need to protect community character was taken into account across three neighborhood typologies: Higher, Moderate, and Lower Impact (*see **Appendix B** for more detail*). In lower impact neighborhoods, the purpose and function of underlying zoning districts mapped in an area steered proposed transient lodging land use permissions. In higher impact neighborhoods, where negative feedback around transient lodging uses was markedly higher (for example, in the Tremé, Bywater, Marigny neighborhoods), the transient lodging use permissions are more restrictive to protect and preserve community character. Further, in higher impact neighborhoods where feedback was more focused on supporting tourism functions (for example, in the CBD), the transient lodging use permissions are

more permissive to support continued, desirable tourism and economic development activities.

d. Permitting existing, licensed transient lodging uses to remain, where CSTRs are established as temporary, legal nonconforming uses able to maintain their nonconforming status as long as the license remains active. Like Noncommercial Short Term Rentals (NSTRs), CTSRs are a temporary use, and a license does not establish a permanent property right to continue once a license has been revoked or expired. Note: it is not the intent of this Study to suggest that 5 existing CSTRs on a block (because 4 are nonconforming) and 1 CSTR on a block are both appropriate. To clarify, recommendations rather acknowledge the existing over saturation of transient lodging uses (both compliant and noncompliant) must be addressed, and a new regulatory regime put in place and utilized effectively before new transient lodging uses are permitted at higher densities.

e. Rebalancing the treatment of transient lodging uses citywide by enabling more consistent by-right approvals for transient lodging land uses that—based on new definitions, use standards, use permissions—are appropriate in specific City zoning districts. This is consistent with the City Planning Commission's Land Use Barriers Study (Sept. 2025), a goal of which was "to recommend amendments that will remove unnecessary conditional use and variance requirements that create obstacles to the creation of housing and small businesses and deter investment." This Study advances implementation of the Study recommendation: "Substantially reduce the number of conditional uses."

f. Finally, as documented in the Study findings, STRs are not improving housing affordability challenges citywide. Recommendations suggest that—by limiting CSTRs' continued proliferation—it is likely that prospective buyers will be less likely to inflate housing and building costs, and more units in mixed-use and commercial areas will be made available for long-term housing and for other local, commercial business opportunities that will help to restore and strengthen community character. This is a primary goal of this Study because it is the very exceptional community character in New Orleans that drives the tourism industry and increases demand for STRs. For this reason, protecting community character must come first.

3. Background and Introduction

3.1 Study Context.

1. *Study approach*. Research, analysis, findings and recommendations made a part of this Study are based on (1) a comprehensive analysis of existing land use regulations, previous studies, the City's Master Plan, and available relevant data from the past 10 years or more (described in detail in **Appendix A: Background & Data Analysis**), (2) local perceptions and lived experiences associated with transient lodging uses gathered from citywide outreach and engagement efforts beginning in April 2025 (described in detail in **Appendix B: Outreach Analysis**), and (3) a neighborhood oriented spatial analysis of both quantitative and qualitative outputs discussed in Section 4 of this Report (described in **Appendix A** and **B**).

2. *Study purpose.* This Study was initiated to develop a comprehensive set of land use and zoning recommendations for transient lodging uses in the City of New Orleans, with a specific interest in recommendations related to Commercial Short-Term Rentals (CSTRs) following the overhaul of Non-Commercial Short Term Rental regulations in March 2023. The Study is in response to a citywide Commercial Short Term Rental Interim Zoning District (IZD) which prohibits new CSTRs. The IZD was enacted by Ord. 29701 on November 7, 2023, extended by Ord. 30130 to May 7, 2025, and was further extended again by Ord. 30292 to November 4, 2025. Study outcomes aim to build on previous studies; and identify, define, and propose appropriate future locations for transient lodging uses.

3. *Study goal.* The goal of this Study, which is consistent with the City's Master Plan, is to develop policy recommendations for CSTRs and other transient lodging uses that balance the need to safeguard neighborhoods and permanent housing opportunities, preserve and enhance the tourism industry, create opportunities for business growth, and support business sustainability.

4. *Study objectives*. The primary objectives of this Study's recommendations are to ensure:

    a. Residents, transient lodging users, and operators can clearly identify and understand the reasoning behind if, when, and why a transient lodging use is permitted or prohibited within the City.
    b. All stakeholders can identify their transient lodging use concerns and interests within the Study's analysis and participate in consensus building towards a broadly applicable set of standards that are consistently applied, as well as neighborhood specific standards that address unique placed-based considerations.
    c. Transient lodging use regulations are streamlined, consistent, and meet the future demands of the City's growing tourism industry.
    d. Recommended Code amendments (**Appendix C**) provide new protections to preserve and promote the development of additional, permanent, long-term housing opportunities in the City.
    e. Residents and business owners appreciate that these standards are nuanced, often divergent, and require a deep understanding of neighborhood conditions (**Appendix A, B, and D**) to help avoid unintended consequences.

5. *Study effect.* The Study is limited to the City's Comprehensive Zoning Ordinance (CZO) and does not include recommendations related to regulations or procedures associated with

transient lodging uses' enforcement, taxation, or licensing within the City's Code of Ordinances. Because the City recently completed a comprehensive analysis of Non-Commercial Short-Term Rentals (NSTRs), the Study does not assess or make recommendations related to the regulation of NSTRs; however, due to the comprehensive nature of recommendations, the Study does address the treatment of Bed and Breakfasts citywide, with a focus on residential districts and neighborhoods.

3.2 Planning Context and Authority

1. *The purpose of the City's Comprehensive Zoning Ordinance*. Zoning, in its most general sense, aims to establish predictable land development patterns across a local jurisdiction in order to enable the efficient and effective review and approval of land development applications and permits consistent with a local Comprehensive or Master Plan's vision, goals and objectives. To this effect, the purpose of the Comprehensive Zoning Ordinance of the City of New Orleans (Sec. 1.2, CZO), includes the following:

   "A. To encourage and promote, in accordance with present and future needs, the public health, safety, and welfare of the citizens of the City of New Orleans.
   B. To provide for efficiency and economy in the process of development.
   C. To provide for the appropriate use of land.
   D. To preserve and enhance the value of structures, communities, and neighborhoods that constitute the distinct places within the city.
   E. To provide for preservation, protection, development, and conservation of natural resources.
   F. To promote the principles of sustainability and resilience.
   G. To provide for functional public utilities and facilities, and for the convenience of traffic and circulation of people and goods.
   H. To provide for promotion of the civic amenities of beauty and visual interest, for preservation and enhancement of historic buildings and places, and for promotion of large-scale developments as means of achieving unified civic design.
   I. To ensure that the policies set forth in City's Master Plan are implemented by the land use regulations and are consistent with the goals set forth in the Master Plan."

2. *Zoning is a City authority enabled by state law*. Before venturing into the main components of this Study's findings and analysis, it is important to recall and reaffirm that the Study's main focus is to establish appropriate land use patterns and associated regulations to consistently determine how and when transient lodging land uses are permitted comprehensively citywide. This action is enabled by the legislative function of zoning, which can be enacted even if the landowner does not approve. In the State of Louisiana, zoning enables the local government's legislative body to regulate and restrict (per LA RS 33:4721) the following:

   - Height, number of stories, and size of structures,
   - Percentage of lot that may be occupied,
   - Size of yards, courts, and other open spaces,
   - Density of population, and
   - Location and use of the buildings, structures, and land for trade, industry, residence, or other purposes.

   The local government must make a good faith effort to notify affected landowners and must give them an opportunity to be heard (LA RS 33:4724). However, the legislative body can

approve the zoning/rezoning of a property even if the landowner objects, provided that a majority of members of the legislative body who are present and voting approve the ordinance (LA RS 33:4725). This authority to regulate and restrict "the location and use of the buildings, structures, and land for trade, industry, residence, or other purposes…" was recently affirmed in Opinion dated October 7, 2025, filed in response to the Appeal from the United States District Court for the Eastern District of Louisiana USDC Nos. 2:19-CV-13773, 2:22-CV-2991.

3.3 History of Transient Lodging Uses*

Note: More detail provided in **Appendix A.*

1. Transient lodging uses are a continually evolving land use. Traditional uses include Bed and Breakfasts, Hotels, and Motels which provide travelers with places to stay outside of the home. In New Orleans, Short Term Rentals (STRs) initially operated outside of land use standards that apply to transient lodging uses. Some stakeholders in New Orleans believed that this new land use activity could create unique, income-generating opportunities for shared underused residential space, where locals could build wealth and reduce poverty. As the land use activity expanded, STRs quickly evolved into a form of commercial lodging—often indistinguishable from smaller hotels and bed and breakfasts in both appearance and function.

2. As STR uses expanded, the City developed regulations to address their new and evolving impacts, often reacting to public pressure. The result was several iterations of STR regulations, and numerous Overlay and Interim Zoning Districts (IZDs) that—overtime—has created a complex regulatory scheme. This piecemeal approach has produced a fragmented landscape, where transient lodging uses are governed by separate rules despite similar land use impacts and activities—particularly in commercial and mixed-use zoning districts.

3. This misalignment has complicated enforcement, blurred the line between similar transient lodging land uses, and raised questions about how the City should distinguish between and regulate different types of transient lodging uses in the Comprehensive Zoning Ordinance. Over the course of the last 10 years, the public, City Council, and multiple Administrations' understanding of STRs has evolved, especially with regards to unforeseen outcomes of permitting STRs in residential neighborhoods and the potential for disruption to local community character and quality of life. Continuing to mitigate these potential negative impacts are core focus of this Study.

4. There are 71 individual neighborhoods in New Orleans (according to New Orleans City datasets provided as part of this Study), and each neighborhood has unique conditions, characteristics, and needs to support a high quality of life for its residents and/or success for its business owners. While the City's neighborhoods are admittedly unique and special, this does not mean regulating transient lodging uses should translate into 71 different regulatory approaches. Reflecting unique development characteristics citywide, there are 71 base (and sub) zoning districts mapped across the city. Of the 71 zoning districts, 52 (73.2%) currently allow transient lodging uses.

5. A goal of this Study is to propose standards that will withstand legal scrutiny and support citywide application in a fair and impartial manner, which is not a simple task given the variety

of opinions on the matter. These opinions are well evidenced in Study in interviews, where 10 out of 21 (48%) interviews said all neighborhoods should be treated the same.[1]

6. In forming Study recommendations, the Project Team found that City's existing zoning district framework is complex and reflects unique neighborhood attributes, where unique districts and land use development patterns provide a sufficient mechanism to regulate transient lodging uses citywide. For this reason, Study analysis leverages existing base and sub-zoning districts, with the intent to streamline user understanding, and avoid over complicating existing regulatory frameworks.

3.4 Previous Studies and Existing Regulations

Note: More detail on previous studies is provided in **Appendix A, and more detail on existing regulations is provided in **Appendix A and C**.*

1. *A changing regulatory environment*. The first STR study was conducted by the City Planning Commission in 2016, after which the City Council adopted regulations resulting in three different STR uses and standards. The regulations were updated again following a 2019 study, where all transient lodging uses' use permissions, use standards, and definitions were amended to mitigate negative impacts, including a homestead exemption requirement for Residential Short Term Rentals. In 2023, the City Council removed the homestead exemption requirement to comply with a court order and, again, updated regulations pertaining to Non-Commercial Short Term Rentals (NSTRs) (previously known as Residential Short Term Rentals). Also in 2023, the City Council initiated the Transient Lodging Study [the end result being this Report and associated recommendations] to study the impacts and recommend updated regulations of Commercial Short Term Rentals and other transient lodging uses. In 2025, the City Council increased regulations on STR platforms to improve enforcement.

2. *Existing regulatory conditions.* Generally, existing land use and zoning regulations associated with transient lodging uses are located in the New Orleans Comprehensive Zoning Ordinance (CZO) and include definitions in **Article 26 – Definitions** and land use standards in **Article 20 - Use Standards.** Use permissions for transient lodging uses (i.e., whether a land use is permitted in each City zoning district by right, conditionally or prohibited) are located in **Articles 7-19** (see **Table 1** for these permissions summarized).

3. *Definitions.* The City currently includes land use standards applicable across all zoning districts within each transient lodging use's ***definition***. Because definitions cannot be amended or modified per the City's Code, including land use standards within codified definitions serves two purposes: it creates consistent treatment of these uses citywide and limits exceptions to their treatment. While these outcomes are positive, rigid consistency can also limit opportunities to adjust a land uses' permissions, density, and treatment in some areas that may have unique considerations worth considering. Study findings acknowledge that the City's 71

[1] Further, 7 out of 21 (33%) interviews emphasized removing the French Quarter and Garden District bans; 5 out of 21 (24%) interviewees said there should be a difference between residential and commercial areas; 5 out of 21 (24%) interviewees said neighborhoods should be regulated differently; 2 out of 21 (10%) said there should be differences for the Central Business District.

existing zoning districts are available to address unique neighborhood characteristics through the application of unique land use permissions (permitted, conditional, prohibited) for each transient lodging use.

Article 26 of the New Orleans Comprehensive Zoning Ordinance (CZO) identifies five different transient lodging types: Bed and Breakfast, Hotel/Motel, Hostel, Short Term Rental, and Timeshare. The definitions further divide Bed and Breakfasts into two types: accessory and principal and Short Term Rentals into two types: commercial (CSTR) and non-commercial (NSTR). Across these different types, transient lodging uses can fit into multiple definitions, making their treatment varied and difficult to reasonably predict based on land use impact. Development of mutually exclusive transient lodging terms (i.e., consistently comparing "apples to apples") and adding definitions for qualifying terms (such as bedroom, sleeping accommodations, etc.) is critical in addressing inconsistent code interpretation, supporting public and user understanding, and applying land use regulations in a fair and predictable manner across the City.

Existing transient housing definitions. Current definitions of transient lodging uses include:

> **Bed and Breakfast.** A single-family dwelling, or other structure that has been legally converted to a single-family dwelling, that provides sleeping rooms for overnight paid occupancy. Bed and Breakfast is further defined as follows:
>
> A. **Bed and Breakfast, Accessory.** An operator-occupied single-family dwelling, which provides no more than five (5) guest bedrooms for overnight paid occupancy of up to thirty (30) nights. Common bathroom facilities may be provided rather than private baths for each guest bedroom.
> B. **Bed and Breakfast, Principal**. An operator-occupied single-family dwelling that provides no more than nine (9) guest bedrooms for overnight paid occupancy of up to thirty (30) nights. Common bathroom facilities may be provided rather than private baths for each guest bedroom.
>
> **Hotel/Motel.** An establishment providing a private room for sleeping accommodations for a fee with private bathroom facilities and customary lodging services. Related ancillary uses may include, but are not limited to conference and meeting rooms, restaurants, sale of convenience items, bars, and recreational facilities. Hotels shall be permitted to include units for sale designed or used exclusively for permanent residential use in all districts except in Light Industrial (LI), Heavy Industrial (HI), and Business Industrial Park (BIP) districts.
>
> **Hostel**. An establishment providing sleeping accommodations for a fee in a sociable accommodation where guests can rent a bed in a dormitory and share bathroom, lounge, and kitchen facilities.
>
> **Rooming House**. A structure containing sleeping rooms where lodging or lodging and meals are provided for five (5) or more unrelated persons but containing less than fifteen (15) sleeping rooms. The sleeping rooms generally do not have private bathrooms or attached kitchens. In a residential zoning district, the minimum length of stay in a rooming house is thirty (30) days. A rooming house with more than fifteen (15) sleeping rooms is considered a guest house. Rooming houses may include restaurants where such are permitted by the underlying zoning.

Short Term Rental. The use and enjoyment by guests of a Dwelling Unit, or any portion thereof, for a period of less than thirty (30) consecutive days, in exchange for money, commodities, fruits, services, or other performances. Hotels, motels, bed and breakfasts, and other land uses explicitly defined and regulated in the CZO separately from Short Term Rentals are not considered to be Short Term Rentals. A Short Term Rental is further defined as follows:

Short Term Rental, Non-Commercial. A Short Term Rental where the operator, who may not be a guest, physically resides in a bedroom on the lot of record containing the Short Term Rental during any guest stays and, if required by the City Code, maintains a primary residence on the lot of record. In some cases, the operator-occupant may be the property owner. The operator and all owners of the property must be natural persons aged 18 years or over. Non-Commercial Short Term Rental is a temporary use as described in Article 21. Only one (1) Non-Commercial Short Term Rental license is allowed per lot, and each permit shall provide no more than three (3) guest bedrooms and six (6) total guests for overnight paid occupancy as a temporary use. Only one lot within each City block, inclusive of all lots fronting any exterior boundary of said block and all interior lots not fronting the public right of way, may be permitted for use as a non-commercial Short Term Rental.

Short Term Rental, Commercial. An establishment providing rental of one (1) or more dwelling units for overnight paid occupancy. Each dwelling unit is limited to five (5) guest bedrooms and no more than ten (10) occupants.

Timeshare Building. A building containing condominium units, rooms or suites of rooms, with or without culinary facilities and subject to a timeshare plan. The construction of or conversion to timeshare buildings must be registered with the Department of Safety and Permits by applying for a Certificate of Use and Occupancy.

Timeshare Plan. Any plan or program in which the use, occupancy, or possession of one (1) or more condominium units, rooms, or suites of rooms in a timeshare building circulates among various unrelated persons for a specific or discernible period by temporal division of less than a sixty (60) day period in any year for any occupant. Timeshare plans include timeshare ownership plans and timeshare use plans, as follows:

A. Timeshare ownership plan is any arrangement, whether through common ownership, sale or by other means, whereby a person receives an ownership interest in a condominium unit, room, or suite of rooms in a timeshare building.

B. Timeshare use plan is any arrangement, excluding normal hotel operations, whether by membership agreement, lease, rental agreement, license, use agreement, security, or other means, whereby a person receives the right to use but not an ownership interest in a condominium unit, room, or suite of rooms in a timeshare building.

4. *Zoning districts where transient lodging uses are permitted.* When considering city-wide zoning classifications, recall 52 of the 71 (72.3%) zoning districts currently permit some form of transient lodging use. These districts are listed below and can be generally grouped into 4 categories for simplicity, which are colored based on if they are generally residential, mixed-use, commercial/entertainment, or special district categories (institutional, etc.). These categories provide some initial framing from which to consider ways to make transient lodging

land use permissions more consistent and predictable across the city's zoning districts. It is not an exact science, and the Project Team acknowledges the complexity of these areas and their development patterns are purposely oversimplified here to begin to create a general, comprehensive understanding of what the City is currently managing. This general picture helps to consider ways of determining specific transient lodging use type, scale, and densities that may be appropriate across residential neighborhoods, commercial districts, entertainment districts, special districts, etc.

Residential
Mixed-Use
Commercial / Entertainment
Special

Residential Districts:

R-RE Rural Residential Estate District	HU-RS Historic Urban Single-Family Residential District	HU-RD1 Historic Urban Two-Family Residential District
HMR-1 Historic Core Marigny/Tremé/Bywater Residential District	S-LRS1 Suburban Lakeview Single-Family Residential District	HU-RD2 Historic Urban Two-Family Residential District
HMR-2 Historic Core Marigny/Tremé/Bywater Residential District	S-RD Suburban Two-Family Residential District	HU-RM1 Historic Urban Multi-Family Residential District
HMR-3 Historic Core Marigny/Tremé/Bywater Residential District	S-RM1 Suburban Multi-Family Residential District	The HU-RM2 Historic Urban Multi-Family Residential District
S-RS Suburban Single-Family Residential District	S-RM2 Suburban Multi-Family Residential District	S-LRD2 Suburban Lakewood/Parkview Two-Family Residential District
S-LRM1 Suburban Lake Area Low-Rise Multi-Family Residential District	S-LRM2 Suburban Lake Area High-Rise Multi-Family Residential District	

Mixed Use Districts:

Rural M-MU Maritime Mixed-Use District	HM-MU Historic Marigny/Tremé/Bywater Mixed-Use District	HU-MU Neighborhood Mixed-Use District
S-MU Suburban Neighborhood Mixed-Use District	MU-1 Medium Intensity Mixed-Use District	MU-2 High Intensity Mixed-Use District
CBD-1 Core Central Business District	CBD-2 Historic Commercial and Mixed-Use District	CBD-5 Urban Core Neighborhood Lower Intensity Mixed-Use District
CBD-6 Urban Core Neighborhood Intensity Mixed-Use District		

Commercial Districts:

The C-1 General Commercial District	VCE Vieux Carré Entertainment District	HU-B1A Neighborhood Business District
The C-2 Auto-Oriented Commercial District	HMC-1 Historic Core Marigny/Tremé/Bywater Commercial District	HU-B1 Neighborhood Business District
The C-3 Heavy Commercial District	HMC-2 Historic Marigny/Tremé/Bywater Commercial District	S-B2 Suburban Pedestrian-Oriented Corridor Business District
CBD-4 Exposition District	S-LB2 Suburban Lake Area Neighborhood Business District	S-LB1 Suburban Lake Area Neighborhood Business District
S-LC Suburban Lake Area General Commercial District		

Special Districts:

Open Space - GPD General Planned Development District	EC Educational Campus District	MI Maritime Industrial District
S-LM Suburban Lake Area Marina District	MC Medical Campus District	BIP Business-Industrial Park District
MS Medical Service District	CBD-3 Cultural Arts District	The CBD-7 Bio-Science District
LS Life Science Mixed-Use District	LI Light Industrial District	HI Heavy Industrial District

4. *Transient lodging uses permitted by right or conditionally.* To help add specificity, re: the multiple types of transient lodging uses having different use permissions across the of city's zoning districts, **Table 1** summarizes current use permissions for transient lodging uses (i.e. how they are currently permitted in the City's zoning districts in accordance with the CZO Articles 7-19, where uses permitted by right are indicated by a letter "P" and highlighted in green, uses permitted conditionally via a Conditional Use Permit are indicated by a letter "C" and highlighted in yellow, and prohibited uses are indicated by a blank cell). The Conditional Use Permit process includes a public hearing where an applicant must demonstrate compliance with the City's codes and consistency with neighborhood character before receiving approval to move forward with their development request. This process is generally applied to transient housing uses to protect historic neighborhoods and districts that abut or include long-term residential uses.

TABLE 1. CURRENT TRANSIENT LODGING USE PERMISSIONS (EXCLUDING NSTRs)[2]

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE	SUB-DISTRICT	TRANSIENT LODGING LAND USES					
		BED AND BREAKFAST – ACCESSORY	BED AND BREAKFAST – PRINCIPAL	HOSTEL	HOTEL/MOTEL	SHORT TERM RENTRENTAL, COMMERCIAL	TIMESHARE
Article 7: Open Space Districts	OS-N						
	OS-G						
	OS-R						
	NA						
	GPD				C	C	
	OS-CBD						
	OS-AR						
Article 8: Rural Development Districts	R-RE	C					
	M-MU	C	C			P	
Article 9: Historic Core Neighborhoods Residential Districts	VCR-1						
	VCR-2						
	HMR-1	C	C				
	HMR-2	C	C				
	HMR-3	C	C				
Article 10: Historic Core Neighborhoods Non-Residential Districts	VCC-1						
	VCC-2						
	VCE	C	C			P	
	VCE-1						
	VCS						
	VCS-1						
	VCP						

[2] City Planning Commission. (2025). *New Orleans Comprehensive Zoning Ordinance.* Retrieved from https://czo.nola.gov/home.

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE	SUB-DISTRICT	TRANSIENT LODGING LAND USES					
		BED AND BREAKFAST – ACCESSORY	BED AND BREAKFAST – PRINCIPAL	HOSTEL	HOTEL/MOTEL	SHORT TERM RENTRENTAL, COMMERCIAL	TIMESHARE
	HMC-1	C	C			C	
	HMC-2	C	C	P	P	P	
	HM-MU	C	C		C	P	
Article 11: Urban Neighborhoods Residential Districts	HU-RS	C					
	HU-RD1	C					
	HU-RD2	C					
	HU-RM1	C	C				
	HU-RM2	C	C				
Article 12: Historic Urban Neighborhoods Non-Residential Districts	HU-B1A	C	C				
	HU-B1	C	C				
	HU-MU	C	C	C	C	P	
Article 13: Suburban Neighborhoods Residential Districts	S-RS	C					
	S-RD	C					
	S-RM1	C					
	S-RM2	C					
	S-LRS1	C					
	S-LRS2						
	S-LRS3						
	S-LRD1						
	S-LRD2	C					
	S-LRM1	C					
	S-LRM2	C					
Article 14: Suburban Neighborhoods Non-Residential Districts	S-B1[5]						
	S-B2[6]					P	
	S-LB1[5&7]	C	C				

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE	SUB-DISTRICT	TRANSIENT LODGING LAND USES					
		BED AND BREAKFAST – ACCESSORY	BED AND BREAKFAST – PRINCIPAL	HOSTEL	HOTEL/MOTEL	SHORT TERM RENTRENTAL, COMMERCIAL	TIMESHARE
	S-LB2[5&8]	C	C			P	
	S-LC[9]	C	C	C	C	P	P
	S-MU	C					
	S-LP						
	S-LM				C	P	
Article 15: Commercial Center & Institutional Campus Districts	C-1			P	P	P	
	C-2			P	P	P	C
	C-3			P	P	P	
	MU-1	C	C	P	P	P	C
	MU-2	C	C	P	P	P	
	EC[3]	C		P	P	P	
	MC			P	P	P	C
	MS				P	P	C
	LS			P	P	P	C
Article 16: Centers for Industry	LI				P	P	
	HI				C	C	
	MI[2]				P	C[6]	
	BIP			P	P	P	P
Article 17: Central Business Districts	CBD-1	C	C	P	P	P	P
	CBD-2	C	C	P	P	P	P
	CBD-3	C	C	P	P	P	P
	CBD-4			P	P	P	P
	CBD-5	C	C		C	P	
	CBD-6	C	C		P	P	
	CBD-7			P	P	P	P

6. *Summary of current zoning, licensing, and use standards for each transient lodging use.* This section examines one transient lodging use at a time and explains first what current standards apply and, second, where it may be permitted currently citywide. The goal of this analysis is to build an understanding, at a high level, of how these uses are treated both individually and as a spectrum currently across the City.

   a. **Bed and Breakfasts**, both accessory and principal, are *only permitted through Conditional Use approval in residential, non-residential, and other applicable districts.* This is a result of Ordinance No. 29382, passed in 2023, which uniformly changed Bed and Breakfast regulations to require a conditional use, regardless of the zoning district. This restriction was a result of ongoing changes to STR regulations where Bed and Breakfasts were oftentimes utilized as a loophole to create STRs. In addition to requirements in the Bed and Breakfast definitions, Use Standards for Bed and Breakfasts are also located in Section 20.3.1 in the City's CZO, and include:

      Bed and Breakfast, Accessory.

      - Proof of operator occupancy shall be established by submission of at least three (3) pieces of proof of residence to the Department of Safety and Permits.
      - The bed and breakfast shall appear outwardly to be a single-family dwelling, giving no appearance of a business use other than a permitted sign.
      - The bed and breakfast may have one (1) attached projecting sign not to exceed four (4) square feet in area. The sign shall complement the architecture of the structure.
      - The bed and breakfast is limited to a maximum of five (5) units for overnight accommodation.
      - Cooking facilities are prohibited in individual guest rooms.
      - If meals are provided, only registered guests may be served.
      - Leasing of a common dining area for social events is prohibited.
      - In residential districts and HU-B1A Neighborhood Business District, HU-B1 Neighborhood Business District, HU-MU Neighborhood Mixed-Use District, S-LM Lake Area Marina District, MU-1 Medium Intensity Mixed-Use District, and MU-2 High Intensity Mixed-Use District, only one (1) Accessory Bed and Breakfast, one (1) Principal Bed and Breakfast, or one (1) Non-Commercial Short Term Rental is permitted within each City block, inclusive of all lots fronting any exterior boundary of said block and all interior lots not fronting the public right of way, may be permitted for use as a Non-Commercial Short Term Rental.

      Bed and Breakfast, Principal.

      - Proof of operator occupancy shall be established by submission of at least three (3) pieces of proof of residence to the Department of Safety and Permits.
      - All signs shall comply with applicable sign regulations for the zoning district.
      - The bed and breakfast is limited to a maximum of nine (9) units for overnight accommodation.
      - Cooking facilities are prohibited in individual guest rooms.
      - If the zoning district allows restaurants, meals may be served to guests other than those registered with the bed and breakfast, provided the facility meets all other applicable City and State codes for food service.
      - Leasing of common areas for social events shall be allowed, provided the facility meets all applicable off-street parking requirements and complies with the noise ordinance and all other provisions of the City Code.

- In residential districts and HU-B1A Neighborhood Business District, HU-B1 Neighborhood Business District, HU-MU Neighborhood Mixed-Use District, S-LM Lake Area Marina District, MU-1 Medium Intensity, Mixed-Use District, and MU-2 High Intensity Mixed-Use District, only one (1) Accessory Bed and Breakfast, one (1) Principal Bed and Breakfast, or one (1) Non-Commercial Short Term Rental is permitted within each City block, inclusive of all lots fronting any exterior boundary of said block and all interior lots not fronting the public right of way.

b. **Hostels** *must obtain Conditional Use Permits* for HU-MU Neighborhood Mixed-Use and S-LC Lake Area General Commercial Districts. *Hostels are permitted by right* in BIP Business-Industrial Park District, CBD 1-4 and 7 Central Business Districts, C-1 General Commercial District, C-2 Auto-Oriented Commercial District, C-3 Heavy Commercial District, MU-1 Medium Intensity Mixed-Use District, MU-2 High Intensity Mixed-Use District, EC Educational Campus District, MC Medical Campus District, LS Life Science Mixed-Use District, and HMC-2 Historic Marigny/Tremé/Bywater Commercial District, which are districts predominately characterized by commercial and tourism uses. Apart from the definition of Hostel, there are no minimum use standards for Hostels in the CZO.

c. **Rooming Houses** are all currently operating as nonconforming uses and generally fall within the land use category and standards of hostel. There are no districts in which these uses are permitted by right or conditionally and no minimum use standards in the CZO.

d. **Hotels / Motels** are *permitted upon approval of a Conditional Use Permit* in GPD General Planned Development Districts, HM-MU Historic Core Neighborhoods Non-Residential Districts, HU-MU Historic Urban Neighborhoods Non-Residential Districts, S-LC Lake Area General Commercial District, S-LM Lake Area Marina Districts, HI Heavy Industrial Districts, and CBD-5 Urban Core Neighborhood Lower Intensity Mixed-Use Districts. Hotels and Motels *are allowed by right* in the HMC-2 Historic Marigny/Tremé/Bywater Commercial District, C-1 General Commercial District, C-2 Auto-Oriented Commercial District, C-3 Heavy Commercial District, MU-1 Medium Intensity Mixed-Use District, MU-2 High Intensity Mixed-Use District, EC Educational Campus District, MC Medical Campus District, MS Medical Services District, LS Life Science Mixed-Use District, LI Light Industrial District, MI Maritime Industrial District, BIP Business-Industrial Park District, and CBD 1-4, 6 and 7 Central Business Districts, which are districts predominately characterized by commercial and tourism uses.

   Apart from the definition of Hotel/Motel (CZO, Article 26), minimum use standards for outdoor live entertainment as a secondary use (CZO, Sec. 20.3.WWW), and criteria for evaluating Hotel/Motel conditional use applications in the CBD-5 District (CZO, Section 20.3.XXX); there are no minimum use standards for Hotels/Motels in the CZO. This is largely because Hotels/Motels are otherwise regulated within the City's Code of Ordinances. While outside the scope of this Study, it is important to note these standards generally address obtaining alcoholic beverage licenses (Chapter 10), permitting amusement and entertainment (Chapter 14), meeting the building code (Chapter 26), ensuring fair business practices in support of the City's tourism industry, including having dedicated staff on site at all times (Chapter 30), and collecting taxes (Chapters 70 and 150).

e. **CSTRs** *must obtain Conditional Use Permits* for the GPD General Planned Development District, the HMC-1 Historic Marigny/Tremé/Bywater Commercial District, the HI Heavy Industrial District, and the MI Maritime Industrial District. CSTRs are permitted by right in the M-MU Maritime Mixed-Use District, the VCE Vieux Carre Commercial District, the

HMC-2 Historic Marigny/Tremé/Bywater Commercial District, the HM-MU Historic Marigny/Tremé/Bywater Mixed-Use District, the HU-MU Neighborhood Mixed-Use District, the S-B2 Pedestrian Oriented Corridor Business District, the S-LB2 Suburban Lake Area Neighborhood Business District, the S-LC Lake Area General Commercial District, the S-LM Lake Area Marina District, C-1 General Commercial District, C-2 Auto-Oriented Commercial District, C-3 Heavy Commercial District, MU-1 Medium Intensity Mixed-Use District, MU-2 High Intensity Mixed-Use District, EC Educational Campus District, MC Medical Campus District, MS Medical Services District, LS Life Science Mixed-Use District, LI Light Industrial District, BIP Business-Industrial Park District, and CBD 1-7 Central Business Districts. However, due to the recently enacted Preserving Residential Character Interim Zoning District and Commercial Short Term Rental Interim Zoning District regulations, ***there is a moratorium on all new CSTR permits until November 5, 2025, unless the City Council takes some action to address this expiration.***

When permitted, CSTRs must also comply with general standards for STRs (Sec. 20.3.LLL.1) and specific standards for CSTRs (Sec. 20.3.LLL.2), detailed below:

Short Term Rentals General Standards

- In addition to the use standards below, all Short Term Rentals shall comply with the regulations of the Department of Safety and Permits and the Department of Finance, Bureau of Revenue.
- All Short Term Rentals shall require a permit. The permit shall be prominently displayed on the front facade of the property at a reasonable height in a location clearly visible from the street and accessible from the public right-of-way during all period of occupancy and contain the permit number, the contact information for the owner or operator, the permit type (Non-Commercial or Commercial) and the bedroom and occupancy limit.
- Short Term Rentals shall not be operated outdoors, in an accessory structure, or in a recreational vehicle.
- Only one party of guests shall be permitted per Short Term Rental unit.
- Both Commercial and Non-Commercial Short Term Rentals shall be considered dwelling units for density purposes and subject to the minimum lot area per dwelling unit requirement of the applicable zoning district.
- A Short Term Rental permit shall be secured prior to operation; and Short Term Rental operators shall comply with all applicable permit requirements provided in the Code of the City of New Orleans.
- The rental of kitchens, dining rooms, living rooms, offices, and other common spaces may be used as part of the Short Term Rental but shall not be rented as guest bedrooms. Only legally permitted bedrooms shall be used for the purposes of calculating the maximum number of guests. Studio apartments and dwelling units shall be considered to have one (1) guest bedroom and allowed a maximum of two (2) guests.
- Notwithstanding anything else herein to the contrary, no Short Term Rental or Bed and Breakfast shall be permitted within the boundaries of the Garden District, which for purposes of this subsection shall be defined as follows: the center line of St. Charles Avenue, downriver side of Jackson Avenue, center line of Magazine Street, and downriver side of Louisiana Avenue. This provision shall not be waived.

Short Term Rental, Commercial Standards

- The permit shall be prominently displayed on the front facade of the property in a location clearly visible from the street or on the exterior of the front door of the dwelling unit being rented for multi-family dwellings, during all periods of occupancy and contain the permit number, the contact information for the permitted operator, the permit type (Commercial) and the unit, guest bedroom and occupancy limit.
- Up to five (5) guest bedrooms may be rented to guests in each unit and occupancy shall be limited to two (2) guests per guest bedroom with a maximum ten (10) guests.
- Commercial Short Term Rentals shall be prohibited on the first floor of a multi-story structure that contains or can contain residential uses on subsequent floors, but (1) does not apply to buildings that are single- or two-family dwellings; (2) does not apply to single-story structures; (3) does not apply to the CBD Central Business Districts, except when the structure is a new construction or a substantial improvement, EC Education Campus, MC Medical Campus, LS Life Science, and M-MU Maritime Mixed-Use Districts, nor the MI Maritime Industrial Commercial and Recreational Subdistrict.
- A Commercial Short Term Rental shall submit the following impact management plans, to be reviewed by the Director of Safety and Permits, and all other relevant City agencies:
  i. Noise abatement plan;
  ii. A security and operation plan; and
  iii. A sanitation plan.
- No more than one (1) unit or twenty-five (25) percent of total units on a lot or a single building constructed across lot lines, whichever is greater, shall be permitted as a Commercial Short Term Rental. In the CBD-5 Urban Core Neighborhood Lower Intensity Mixed-Use District, the Commercial Short Term Rental shall only be authorized when the total number of housing units is at least ten (10) and triggers the Mandatory Inclusionary Zoning regulations of Article 28. This cap shall not apply to the VCE Vieux Carré Entertainment District, to structures which front on Canal Street between the Mississippi River and Rampart Street, the EC Educational Campus District, MC Medical Campus District, LS Life Science District, or the MI Maritime Industrial District Commercial and Recreational Subdistrict.
- Any structure that contains 10 or more dwelling units that are used as Short Term Rentals shall have a designated and permitted Operator as required by the Code of the City of New Orleans.

f. **Timeshares** must obtain a Conditional Use Permit to locate in the C-2 Auto-Oriented Commercial District, MU-1 Medium Intensity Mixed-Use District, MC Medical Campus District, MS Medical Services District, and the LS Life Science Mixed-Use District. Timeshares are permitted by right in the S-LC Lake Area General Commercial District, and the CBD 1-4 and 7 Central Business Districts. Apart from the definition of Timeshare Building and Timeshare Plan, there are no minimum use standards for Timeshares in the CZO.

7. *High-level conflicts and alignment in regulatory frameworks.* Upon review of existing definitions, use standards, and zoning district regulations across the City (**Table 1**), there is a need for a clear regulatory policy that establishes a hierarchy of land use impacts associated with transient lodging uses across both the City's zoning districts, use permissions, standards, and definitions. Opportunities to improve and clarify the city's current policy regime are described below:

    a. CSTRs are permitted by right in eight zoning districts that Hostels, Hotels / Motels, and Timeshares are not: the M-MU Maritime Mixed-Use District, the VCE Vieux Carre Commercial District, the HM-MU Historic Marigny/Tremé/Bywater Mixed-Use District, the HU-MU Neighborhood Mixed-Use District, the S-LB2 Pedestrian Oriented Corridor Business District, the S-LM Lake Area Marina District, and the CBD-5 Urban Core Neighborhood Lower Intensity Mixed-Use District.

    b. Bed and Breakfasts are permitted in these same zoning districts with a higher level of scrutiny applied (through a Conditional Use Permit), except for the S-LB2 Pedestrian Oriented Corridor Business District and the S-LM Lake Area Marina District.

    c. CSTRs are permitted in the S-LC Lake Area General Commercial District along with Timeshares, but Hotels / Motels and Hostels are not.

    d. Conversely, Hotels / Motels are permitted by right in MI Maritime Industrial Districts, while Bed and Breakfasts, CSTRs, Hostels, and Timeshares are not.

    e. There are 11 districts that allow CSTRs that do not permit Bed and Breakfasts: the S-B2 Pedestrian Oriented Corridor Business District, the C-1 General, C-2 Auto-Oriented, and C-3 Heavy Commercial District, the MC Medical Campus District, the MS Medical Services District, the LS Life Science District, the LI Light Industrial District, the BIP Business-Industrial Park District, the CBD-4 Exposition District, and the CBD-7 Bio-Science District.

Increased clarity could be achieved through more specific definitions and an established methodology for when, where, and why these land uses are permitted across the City's residential, mixed-use, commercial/entertainment, and special zoning districts. Absent this regulatory framework, temporary measures, such as Interim Zoning District (IZD) standards and conditional use permitting processes, have been put into place to prohibit Commercial Short-Term Rentals, and to limit transient lodging uses' impact on historic neighborhoods that abut or include residential districts.

3.5 Key Findings from Data Analysis.

**Note: Additional detail provided in Appendix A.*

1. *Data sources, limitations, and efforts to address gaps in understanding.*

    a. This Study relies on City, State, and federal data sources, with academic and third-party data sources incorporated as needed (*See **Appendix A, Sec. 2.2** for more detail*). The conditions of existing data utilized and described in more detail in **Appendix A** and significant outside factors made targeting analysis on specific transient lodging uses (such as CSTRs) as part of this Study challenging. These challenges included, but were not limited to the following factors: the use of generalized land use classifications in relevant datasets; inconsistent terminology across datasets; changing federal policies during the pandemic (such as moratoria on evictions and rental subsidies); missing permit data due to unforeseen data losses in 2019 as a result of a City cyber attack; a pause in City STR licensing in 2023 due to

a lawsuit; and changing City STR regulations taking effect during the course of the Study. All of these factors create data fluctuations that are difficult to account for. It is also notable that they are often not market-driven, but policy-driven.

b. This Study accounts for the normalization of datasets pre- and post-pandemic, as well as fluctuations in data in response to waves of new STR regulations taking effect over the last 10 years. A Working Group was also established, comprised of internal City experts, to examine fluctuations in data and address data-related questions and concerns throughout the course of this work. Further, data limitations heightened the need for additional community engagement activities to collect and compare qualitative datasets to fill data gaps and test the validity of data-related findings. It is a core goal of this Study to make comprehensive, informed, and carefully considered Study recommendations. To this effect, only findings based on conclusive data and analysis inform the basis of final policy recommendations.

2. *Key data trends and considerations.*

a. While transient lodging uses have always existed in the City, STRs grew in popularity over the last 10 years, with a noticeable spike in popularity between 2017-2019 where thousands of Commercial and Non-Commercial Short Term Rental permits were issued, followed by a decrease in activity during the pandemic and after STR policy changes were adopted.

b. As of March 2025, STRs made up the majority (88% or 2,842) of all licensed transient lodging uses, of which CSTRs made up 40.2% or 1,134 licenses, followed by Hotels and Motels (223; 7.9%) and Bed and Breakfasts (109; 3.9%).

- **Bed and Breakfasts.** The 109 total Bed and Breakfasts with current occupational licenses in the City included eleven 1-2 room Bed and Breakfasts, five 3-5 room Bed and Breakfasts, and 93 Bed and Breakfast Inns.
- **Hostels.** Existing Hostels are not permitted as separate uses in the permit data despite being a separate use in the Comprehensive Zoning Ordinance. Of the four uses that advertise themselves as hostels, 2 had Hotel occupational licenses, and 2 had Bed and Breakfast Inn occupational licenses.
- **CSTRs.** Of the 1,134 CSTR licenses, 811 (72%) were owned by companies, trusts, or LLCs. A total of 640 (56%) of the listings were from companies that held two or more licenses. In total, 143 companies had 2 or more licenses, and 14 companies had 10 or more licenses. Additionally, the companies with multiple licenses often had units in the same building or neighboring buildings. A total of 8 buildings in the City had 10 or more listings: 1041 Constance Street, 451 Girod Street, 722 Girod Street, 2228 Gravier Street, 212 Magazine Street, 1429 North Claiborne Avenue, 800 St. Charles Avenue, and 711 South Peters Street. Of note, the multiple listings in the buildings were primarily owned by one or two companies. Concentrations of CSTR licenses that are held in single ownership and are located within and across multiple buildings create a significant land use impact on neighboring properties and neighborhood character. This unique situation is discussed in more detail as part of stakeholder interviews, focus groups, and community survey findings and suggests additional density and occupancy land use standards are needed to stop this type of land development pattern from continuing in the future.

- **Hotels / Motels.** The Comprehensive Zoning Ordinance categorizes hotels and motels as the same use. As of March 2025, there were 223 currently licensed Hotels and Motels of all different sizes and occupancy levels.
- **Timeshares.** The City does not currently track timeshare units through permit data. Seventeen (17) buildings were isolated as part of this Study as having potential timeshare units.

c. Code violations over the last 10 years tend to spike after each iteration of new STR policies were codified and those regulations were enforced.

d. As of March 2025, there were 10,567 reported non-compliant listings according to Granicus data, and a total of 7,552 non-compliant listings remained in the City at this time. This is three times more than all STRs currently licensed to operate. Upon Council action in the Summer of 2025, updated regulations targeted towards online platforms resulted in an 88% decrease (total 905) in noncompliant listings as of August 2025.

3. *The tourism economy.* Transient lodging uses have become an important part of the City's tourism economy, providing new sources of revenue for residents and businesses, employment opportunities, state and local tax revenue, and specific contributions to the City's Quality of Life Fund. Transient lodging uses have also been a significant part of the City's post-pandemic recovery economy by helping the City return to 2019 pre-pandemic levels in tourism spending and tax revenues.

a. Hotels and Motels pay 4% of their occupancy fee to the Louisiana Stadium and Exposition District Room Occupancy Tax and 3% to the Ernest N. Morial New Orleans Exhibition Hall Authority Tax. These percentages are taken from the hotel occupancy tax of 50 cents per night for hotels with 10 to 299 rooms, 1 dollar per night for hotels with 300 to 999 rooms, and 2 dollars per night for hotels with 1,000 or more rooms.

b. Bed and Breakfasts contribute a flat annual fee to the City of $200 per year for 1 and 2 room rentals, and $600 per year for 3 to 5 room rentals. There is an additional occupational license tax of $2 per room per night for Bed and Breakfasts with 6 or more rooms. Bed and Breakfasts also pay a hotel occupancy tax of 50 cents per room per 24-hour period if they have 3 to 9 rooms.

c. Special STR tax revenues distributed to the Quality of Life Fund represent a new source of revenue for the City that generates significant income ($7M in 2023) for City residents and businesses dedicated to improving their quality of life.

d. Additional analysis in **Appendix A, Sec. 3** includes a review and examination of the fluctuations in tourism, jobs, revenue, spending, and lodging demand, including the impacts of recent federal policies from 2003 to 2025 to help support an adequate supply of available transient lodging units and to encourage and support the tourist industry in years to come. The results of this analysis generally conclude that:

- The United States, as a country, is experiencing a downturn in foreign visitors due to the impacts of federal policies related to a federal crackdown in crime in cities and ICE's illegal immigration policy, as well as travel bans and tariffs.
- Higher costs associated with tariffs, and increased costs of living are limiting local, domestic tourism.

- Projections over the course of the next 10 years, based on previous spending and demand, continues to suggest longer-term higher demand for lodging uses is on the horizon.
- Projections that take into account both the rate of increased hotel capacity (including the rate of new hotel room construction) and the increased rate of hotel demand suggest that—should current trends of increased hotel capacity and demand continue—the hotel capacity should continue to meet the hotel demand as visitor counts and spending continue to grow over the next 10 years.

e. In consideration of these findings, continued support for the tourism industry is needed, specifically with regards to the proliferation of hotels / motels who have a 24/7 on site operator. This support can be provided without compromising community character to meet future tourism demand.

5. *What is community character?* The American Planning Association notes that "Community character refers to the distinct identity of a place. It is the collective impression a neighborhood or town makes on residents and visitors. Generally, you can group objective characteristics that contribute to perceptions of community character into three broad categories: urban form, natural features, and demographics."[3] To this effect, community character is not only reflected in buildings and streetscape, but also made of the ***people*** who permanently live, work, and call New Orleans home. The City's Master Plan Chapter 5: Neighborhood Goals speak to the need to support community character and social and cultural characteristics:

   a. Enhance character and livability for all neighborhoods, with investments to improve quality of life.

   b. Tailor policies and programs to maintain and enhance the physical, economic, social and cultural character and diversity of existing residential neighborhoods.

   c. Focus investment strategies to meet neighborhood needs and promote equity and access to opportunity.

   d. In neighborhoods and areas with increasing market activity, prevent displacement of existing residents by providing home rehabilitation resources, and creating new affordable homeownership and rental housing units.

6. *Housing redevelopment, opportunities, occupancy, and affordability.* As part of this Study, the Project Team delved into the effects of housing redevelopment, housing opportunities, and affordability to better understand how (and if) transient lodging uses impacted the local population (See **Appendix A** for this analysis). Due to data limitations and significant contributing factors during the pandemic, such as moratoria on evictions and rental subsidies, it is difficult to conclusively account for direct impacts to housing loss or unaffordability due to STRs. For example, the datasets analyzed (including vacant units, poverty, and eviction data) show a pre-pandemic rate and a post-pandemic rate with a marked decrease during the pandemic followed by slight increases that are not significantly different to pre-pandemic rates. This suggests that many of these rates may be simply normalized after the pandemic. For these

[3] *Measuring Community Character*, American Planning Association, PAS Quicknotes No. 72.

reasons, it is not conclusive that STRs are contributing to poverty rates within the City, resulting in higher than normal eviction rates citywide, or having an impact on the overall housing occupancy rate of the City.

A recent analysis of Mandatory Inclusionary Zoning Districts commissioned by the City of New Orleans found that affordable housing units as well as market rate housing developments are difficult to create in the current market due to rising development costs and insurance rates. Further, decreasing the current affordable housing set-aside and increasing the AMI (average median income) levels would still not create feasible developments.

What is difficult to reconcile is (1) there continues to be increased redevelopment activity occurring across the City, evidenced by continued infill development and housing sales, and (2) when comparing citywide datasets, this increased development activity does not appear to benefit the local population. Specifically, new development is not resulting in an increase in the city's local population, nor improvements to the short- and long-term renter and owner-occupied units across the City.

Of note, as part of the Study's citywide outreach and engagement (discussed more in the following section), some participants argued that transient lodgings uses are not intended to solve the citywide challenges of declining population and affordable housing, and that these units and uses should not be compared and pitted against one another in a "this" or "that" formula. This premise is discussed in more detail below, as the question of choosing to allow "one use over another" does in fact impact community character.

7. *How do you protect community character?*

   a. When thinking about permitting a long-term land use vs. a short-term (transient) land use, it is important to first consider how each unit in the city—both commercial and residential—represents an opportunity to provide a permanent resident with a place to live or a local business owner with a space to invest in themselves and enhance their community's character by their ***permanent*** presence. They are the ***people*** that contribute to community character.

   b. It is also important to unpack how STRs, in particular, tend to be concentrated in competitive markets, where these land uses occupy the same spaces or units that would otherwise support long-term housing or commercial business opportunities through home ownership, rental units, or business spaces. The demonstrated, continued growth in STRs—despite the continuation of lawsuits, interim zoning standards, and platform reforms—suggests that these uses are very likely to continue to locate where they are permitted.

   c. Limiting the overconcentration of STRs (including CSTRs) in particular will better protect community character by (1) preserving existing long-term housing units, (2) limiting land use speculation and potential increased building costs, (3) protecting commercial spaces that sustain the city's small- and micro-business base, which altogether better enable "thriving, mixed-use urban centers" consistent with the goals of the city's Master Plan.

   d. To this effect, the widespread overconcentration of STRs in the city has resulted in a notable loss of community character and social fabric. This loss is not a byproduct of guests partying or of poor management—it is a result of the very nature of transient lodging uses themselves. Where—without routine, security, and predictability woven from the everyday lives of the people who frequent a place—transient lodging uses create tangible gaps in the

social fabric that community character is built from. These gaps are not just felt in the loss of long-term housing units, but also in the loss of local brick and mortar commercial businesses along commercial corridors. To this effect, when too many land uses on a given block are taken up by transient lodging uses, they contribute to a loss in community character because they change both the urban form and demographics of an area.

3.6 Key Findings from Outreach Analysis.

**Note: Additional detail provided in Appendix B.*

1. *Scope, need, and setting.* The scope of outreach efforts included launching a project website (www.neworleanshousinganalysis.com) where any member of the public could sign up for project notifications. The project website was launched as part of a City Planning Commission public meeting on April 8, 2025, to re-introduce the public to the Study. A community survey was also launched at this time resulting in 1,261 responses. Focus groups were held with 68 participants, and interviews were conducted with 31 individual stakeholders in 21 stakeholder meetings. It is important to note that these efforts were expanded in March 2025 to include the community survey and additional focus group meetings in response to the data limitations discussed in **Appendix A** and Section 3.5 of this Report. The public hearing was in person; focus groups were conducted online and in person; the community survey was conducted online; and the stakeholder interviews were conducted virtually.

2. *Focus groups.* The Project Team sent focus groups invitations to all members of the project notification list, which was developed through online voluntary signups and was reviewed and added to by City Staff, the City Planning Commission, and the Working Group. Focus group flyers were also distributed through the Department of Neighborhood Engagement and the stakeholder list to attract participation. Focus groups were organized by the following topic areas: (1) Affordable Housing and Neighborhood Character, (2) Economic Development, and (3) Permitted Uses and Nuisance Regulations. In-person focus groups were offered at the Milton H. Latter Library, the Rosa F. Keller Library, and the Algiers Regional Library. Attendees had the option to meet with the project team via a subsequent one-on-one stakeholder meeting if they had more to contribute than what could be accommodated in the larger focus group meeting. All attendees were provided written information on the Study's context and preliminary findings from a sample of community survey responses collected from May 8 – April 22 (608 responses at the time) and were sent meeting summaries to support transparency. Focus group discussions centered around regulations, enforcement, density of transient lodging uses, and affordability. Moreover, the focus groups highlighted the following community sentiments and directives related to this Study:

    a. Simplify transient lodging use regulations.

    b. Enhance enforcement of the current regulations, particularly for NSTRs.

    c. Isolate opportunities to generate tourist dollars to offset the cost of construction, redevelopment of aging building stock, and affordable, long-term housing opportunities.

    d. Work to retain local businesses and neighborhood character.

    e. Examine density and use standards for transient lodging uses on a zoning district by district basis as well as at the neighborhood level.

    f. Keep affordability and displacement in mind when making regulatory changes and use transient lodging fees for affordable housing.

3. *Community survey.* The survey was open 19 days and available online and in paper formats. It was advertised at the April 8th, 2025 City Planning Commission meeting and through 31 yard signs located at all City firehouses. It was distributed through the project website, the Department of Neighborhood Engagement, at focus group meetings, and sent to over 700 individuals on the project stakeholder mailing list.

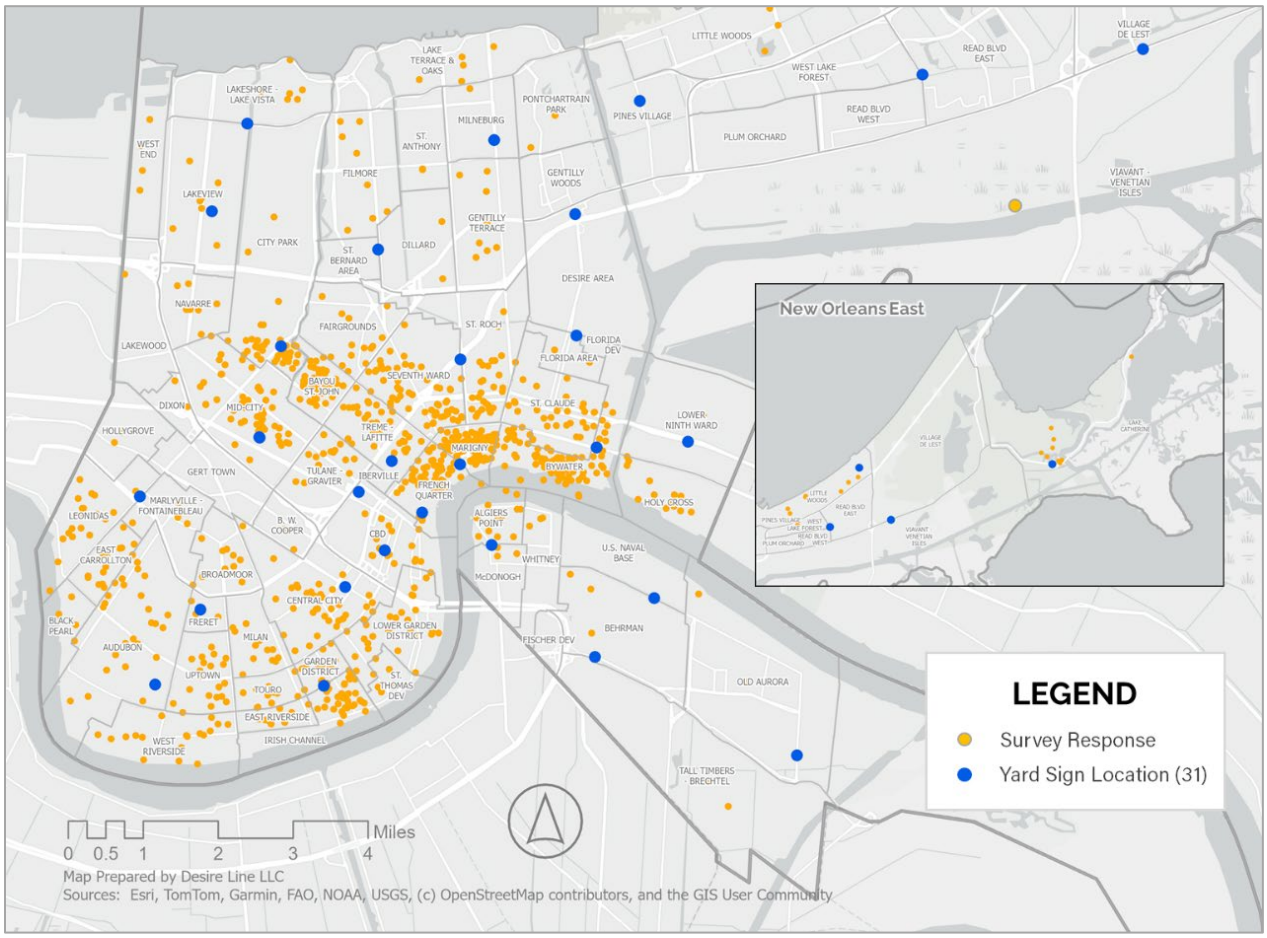
    a. *Demographics.* In the 19 days the survey was open, 1,261 responses were received from across the City (**Figure 1**).

        - **Residence:** 1,168 respondents (92.6%) identified as residents of New Orleans. Amongst non-residents, the primary reasons for participation were owning property in the City (63 respondents; 5.0%) and having previously lived in the City (14 respondents; 1.1%).
        - **Own/Rent:** Of those respondents who identified as living in New Orleans, 799 (68.4%) are homeowners and 365 (31.3%) are renters. Compared to the City's population, homeowners are overrepresented in the survey. Per 2023 American Community Survey data, 56% of households in the City are homeowners.
        - **STR Ownership:** 135 (10.7%) respondents reported owning one or more Short Term Rental units, 21 (1.7%) respondents used to own an STR, and 1,184 (93.9%) have never owned an STR. While the number of individuals who own STRs in the City is not known, the survey population likely overrepresents STR owners as compared to the City's total adult population by more than 5 times.[4]
        - **Neighborhood:** The survey received responses from residents of 58 of the City's 73 neighborhoods.[5] The four neighborhoods with the most responses (Marigny 91; Bywater 91; French Quarter 58; Seventh Ward 58) represent 20.5% of all responses from New Orleans residents. Thirteen (13) neighborhoods received no responses which is consistent with very low levels of STR activity in those neighborhoods (<5 reported units per neighborhood).

[4] Granicus data identifies 3,634 unique STR owners, of which 695 (19.1%) are reported as LLCs and 2,939 (80.9%) are reported as natural persons. 2,406 additional units are of unknown ownership at the time of analysis. Because LLCs may each be owned by one or more individuals, and an individual may own multiple LLCs, it is difficult to determine the true prevalence of STR ownership amongst the city's population. Assuming each LLC represents one unique owner, STR owners may be overrepresented in the survey by as much as 6.8x compared to the city's total population of STR owners.

[5] As defined by The Data Center's 2020 neighborhood boundaries.

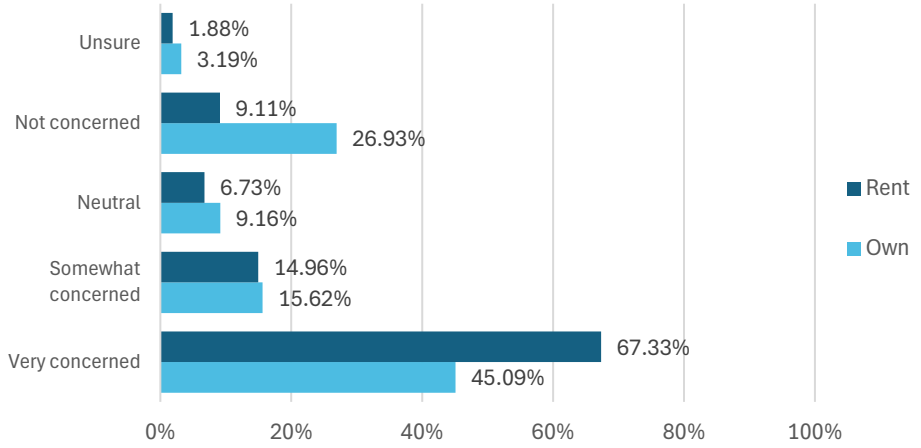
FIGURE 1. 1,261 COMMUNITY SURVEY RESPONSES CITYWIDE



b. *Experience with Transient Lodging.* Respondents described both positive and negative impacts of STRs on their neighborhoods. The respondent demographics also impacted these views. **Figure 2** on the following page shows how homeowners and renters experience both positive and negative impacts of transient lodging uses, where negative outcomes included increases in noise levels, difficulty finding parking, higher housing and rent costs, increases in evictions, decreases in public safety, and a loss of neighborhood character and positive impacts included increases in tourism or visitors, local spending, property improvements and renovations, property values, and public safety.

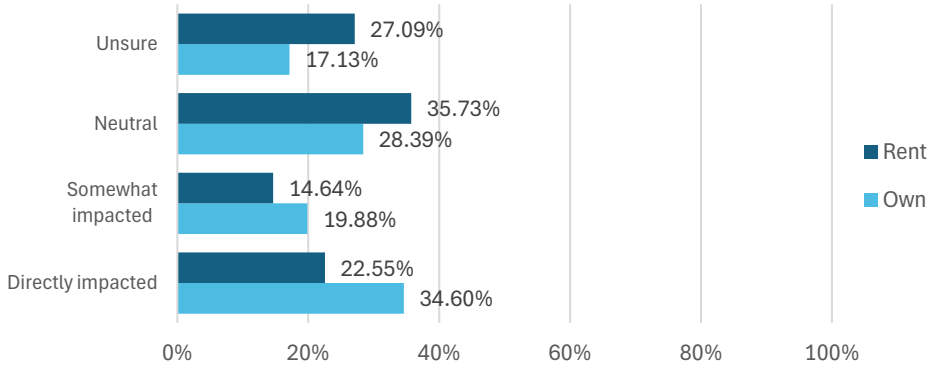
FIGURE 2. AGGREGATED CONCERN OVER NEGATIVE IMPACTS OF TRANSIENT LODGING USES, BY RENTER/OWNER

Question: "If you have experienced any of the following negative impacts of Commercial Short Term Rentals, how concerned are you about these impacts?"



AGGREGATED POSITIVE IMPACT EXPERIENCED FROM TRANSIENT LODGING USES, BY RENTER/OWNER

Question: "If you have experienced any of the following positive impacts of Commercial Short Term Rentals, select the level of impact you have experienced."



While both homeowners and renters described themselves as "very concerned" over negative impacts of transient lodging uses more often than any other level of concern, renters showed significantly higher levels of concern than homeowners. Homeowners, on the other hand, were more likely than renters to report being "directly impacted" by the positive effects of CSTRs (34.60%) compared to renters (22.55%). Renters, however, were more likely to describe themselves as "neutral" (35.73%) or "unsure" (27.09%) about positive impacts when compared to homeowners (28.39% neutral and 17.13% unsure). Overall, this suggests homeowners perceive or experience more direct benefits from CSTRs than renters do, while renters remain less certain or neutral about such impacts.

c. *Community priorities.* Respondents offered recommendations for how they would like CSTRs regulated in their neighborhoods and citywide. The survey informed respondents that the City is currently working to improve the rules for Commercial Short Term Rentals and asked what the City should focus on in updating the rules.

TABLE 2: SURVEY RESPONDENTS' PRIORITIES.

%[6]	FOCUS AREA
72.8%	Stopping the operation of illegal CSTRs.
62.6%	Preserving housing for people who live in New Orleans all year.
59.2%	Keeping neighborhoods residential.
57.3%	Limiting the development of future CSTRs.
51.4%	Phasing out existing grandfathered CSTRs that are no longer permitted.
42.5%	Making sure CSTRs are well-maintained and managed.
28.5%	Creating one set of rules of all transient lodging types to follow.
25.5%	Allowing transient lodging uses based on neighborhood history and development patterns.
7.3%	Other.
4.7%	The City should not make any changes.

d. *Key findings.* Survey responses provided insight into the community impacts and sentiments surrounding STRs (both commercial and non-commercial), as well as other transient lodging uses. The responses also focused on quality of life and preservation of neighborhood character, displacement due to unaffordability, density of STRs in the community, and regulations and enforcement. While a detailed analysis of survey results is in **Appendix B**, a few key findings and directives are listed below:

- Broad consensus amongst all cohorts that current STR regulations need reform.
- Frustration regarding a perceived lack of enforcement of existing STR regulations.
- CSTR owners expressed belief that STRs are a benefit to the local economy and housing market while those who don't own CSTRs emphasized the negative impacts of this use in the community.

[6] Note: These percentages do not add up to 100% because respondents were allowed to pick more than one option.

- Renters (365) show much stronger support for the City pursuing protective and restrictive measures. A significantly higher percentage of renters, compared to homeowners, believe the City should prioritize preserving housing for year-round residents, stopping illegal CSTRs, keeping neighborhoods residential, limiting the development of future CSTRs, and phasing out grandfathered CSTRs that are no longer permitted. These trends suggest that renters feel more acutely threatened by the proliferation of CSTRs.
- Homeowners (799) more directly experience the positive impacts of STRs in their neighborhoods compared to renters who describe their experiences with the positives as neutral or minimal. Owners are more likely than renters to support measures like making sure CSTRs are well-maintained and managed and allowing transient lodging uses based on neighborhood history and development patterns. Owners also show a slight preference for creating a single set of rules for all transient lodging types. These differences suggest that homeowners are more concerned with addressing issues via quality and oversight of CSTRs rather than their outright limitation and may also see some benefit in regulatory nuance depending on the neighborhood context.
- Both renters and homeowners generally reject the idea of maintaining existing regulations, with only a small fraction believing the City should keep the status quo. This indicates a consensus that reform is necessary—though they diverge on what those reforms should look like.
- 61.2% of respondents agree or strongly agree that Commercial STRs should be regulated more like hotels and motels while 57.9% agree or strongly agree Commercial STRs should be regulated more like Bed and Breakfasts.
- When asked how CSTRs should be regulated in their own neighborhoods, 40.0% favored a total prohibition of commercial units, 36.8% favored limiting them to mixed-use districts and commercial corridors, and 18.3% favored permitting them in their neighborhood.

4. *Stakeholder interviews.* A total of 31 stakeholders participated in 21 separate stakeholder interviews. These stakeholders were identified by the City, Study participants, focus group participants, and by themselves through the project website contact form. The interviewees included representatives from real estate, development, banking industries, housing advocacy groups, economic development professions, neighborhood associations, Short Term Rental industries (owners and operators), and the hotel industry. Interviews were held after the completion of the focus groups and the closure of the community survey. The stakeholder meetings aimed to support consensus-building and provide heightened clarity on details discussed during the focus groups, particularly those pertaining to regulatory changes. Stakeholder recommendations from the interviews include:

   a. Clarify and streamline regulations.
   b. Simplify use standards.
   c. Increase enforcement rather than regulations.
   d. Support economic development in the City.
   e. Examine transient lodging uses based on occupancy and scale.

f. Place transient lodging uses in commercial and mixed-use districts.

g. Connect transient lodging use fees to affordable housing.

h. Regulate hosting platforms more thoroughly.

Overall, there was a significant number of mixed responses to the interview questions, underlining the need for careful consideration necessary to effectively update regulations and mitigate potential impacts of transient lodging uses.

5. *Public feedback on specific transient lodging uses*. Each transient lodging use is listed below, with a summary analysis of feedback received from outreach and engagement efforts.

   a. **Bed and Breakfasts.** Focus group participants did not find any issues with Bed and Breakfasts. A total of 43% of interviewees said CSTRs, Bed and Breakfasts, and Hotels should be regulated similarly. Nearly 60% of survey respondents stated that Bed and Breakfasts are located within walking distance of the area where they live. A total of 46.55% of survey respondents stated that Bed and Breakfasts should be permitted in their area, and 40.13% said that they should be limited to mixed-use areas.

   b. **Hostels.** There were no comments from stakeholders regarding Hostels, either positive or negative.

   c. **CSTRs**. Focus group attendees emphasized the need for stronger regulations on CSTRs based on size or intensity to protect residential neighborhoods and affordability while still maintaining economic opportunities. They also stressed the importance of clearer regulations and consistent enforcement. Stakeholder interviews similarly highlighted the need to limit CSTRs based on size, number of licenses, and/or proximity to one another. A total of 48% of interviewees said that CSTRs should be limited based on size, number of licenses, and/or distance, and an additional 33% of interviewees said they should be limited to at least some of these factors. The survey data reflects these concerns: 72.88% of survey respondents stated that there was a CSTR within walking distance of their home, and reported numerous negative impacts of these CSTRs, while acknowledging positive impacts as well. A total of 40.21% of community survey respondents said that CSTRs should be permitted in the area in which they live, and 36.72% of respondents said that CSTRs should be limited to mixed-use or commercial corridors. The highest ranked priorities for new CSTR policies focused on stopping illegal CSTRs, preserving housing, maintaining residential character in neighborhoods, and limiting development of future CSTRs. The neighborhoods with the highest concentration of STR units and the most active neighborhood engagement on quality of life issues were the Central Business District, Bywater, Marigny, and Seventh Ward.

   d. **Hotels / Motels.** Focus group attendees stated that hotels are different from CSTRs but should have onsite operators. They indicated that transient lodging uses should be on commercial corridors or in commercial and mixed-use zones with appropriate limitations. Interviews with stakeholders also underlined the need to place transient lodging uses in mixed-use and commercial corridors. Further, a total of 43% of interviewees said CSTRs, Bed and Breakfasts, and Hotels should be regulated similarly. A total of 50.59% of survey respondents said there was a hotel located within walking distance of their area, and 59.79% of survey respondents said that hotels/motels should be limited to mixed-use areas or along commercial corridors.

e. **Timeshares.** There were no comments from stakeholders regarding timeshares, either positive or negative.

6. *Enforcement.* The Focus Groups, stakeholder interviews, and community survey all recommended additional and/or increased enforcement for transient lodging uses.

3.7 Community Comparison.

Note: More detail provided in **Appendix A.*

1. *Consistent STR growth rates.* As the City's total number of STRs has grown over the years, so too have STRs in comparable US cities. In 2024, Inside Airbnb reported 7,118 Airbnb listings in New Orleans (compared to 10,567 listings reported by Granicus, a software tool the City uses to track unpermitted and unlicensed STRs); 5,221 listings in Dallas (population 1.3 million), 7,953 listings in Chicago (population 2.7 million), and 8,995 listings in Nashville (population 689,447). This data helps establish a general trend in the STR market and suggests that STRs in New Orleans are generally aligned to other cities with similar markets. While the number of STRs themselves are aligned, the percentage of STRs in New Orleans is much higher because the population of New Orleans is significantly less than the other cities. *Note: Inside Airbnb does not characterize whether these rentals are commercial or residential in nature and could include both permitted and illegally operating units.*

2. *Jurisdictions reviewed.* **Section 5.2** in **Appendix A** includes an examination of current CSTR regulations in the cities reviewed as part of the "best practices" sections in previous New Orleans' STR studies. These cities have amended their regulations based on lessons learned over time and include Austin, Nashville, Philadelphia, Portland, Key West, Las Vegas, San Francisco, Savannah, the State of Wisconsin, Boston, Charleston, Chicago, New York City, Santa Monica, Pacific Grove, Seattle, Honolulu, Irvine, and San Antonio.[7]

3. *Jurisdictions that only permit owner-occupied STRs.* Those jurisdictions that only permit owner-occupied STRs, which effectively prohibit CSTRs by exclusion, include Boston, Jefferson Parish, Las Vegas, New York City, Philadelphia, Portland, San Francisco, and Santa Monica.

4. *Jurisdictions that permit CSTRs.* CSTRs are permitted in Austin, Charleston, Chicago, Honolulu, Irvine, Key West, Nashville, Pacific Grove, San Antonio, Savannah, Seattle, and the State of Wisconsin. **Table 24** in **Appendix A** provides use criteria, requirements, and restrictions put in place by these jurisdictions, which include 24-hour site managers, building and fire code compliance, licenses and certificates, registration and payment of taxes, liability and property insurance, retention of records, as well as license renewal requirements. Many jurisdictions also enforce additional restrictions, such as density caps, prohibitions on building types, requirements on length of time, and zoning restrictions. Five of the cities enforce regulations applicable to the STR host platforms, requiring platforms to review advertisements and provide reports to the local government agency.

5. *Other transient housing land use regulations.* Multiple jurisdictions also institute zoning and land use requirements for Bed and Breakfasts, Hotels and Motels, and other transient lodging uses. These requirements are listed in **Table 25** in **Appendix A** and include a review of standards in Austin, Boston, Charleston, Chicago, Honolulu, Jefferson Parish, Key West, Las Vegas,

[7] Cramer, Paul et al. (2019). *Short Term Rental Study, 2019 Edition*. City Planning Commission, City of New Orleans. https://nola.gov/next/city-planning/topics/major-studies-projects/2019-short-term-rental-study/.

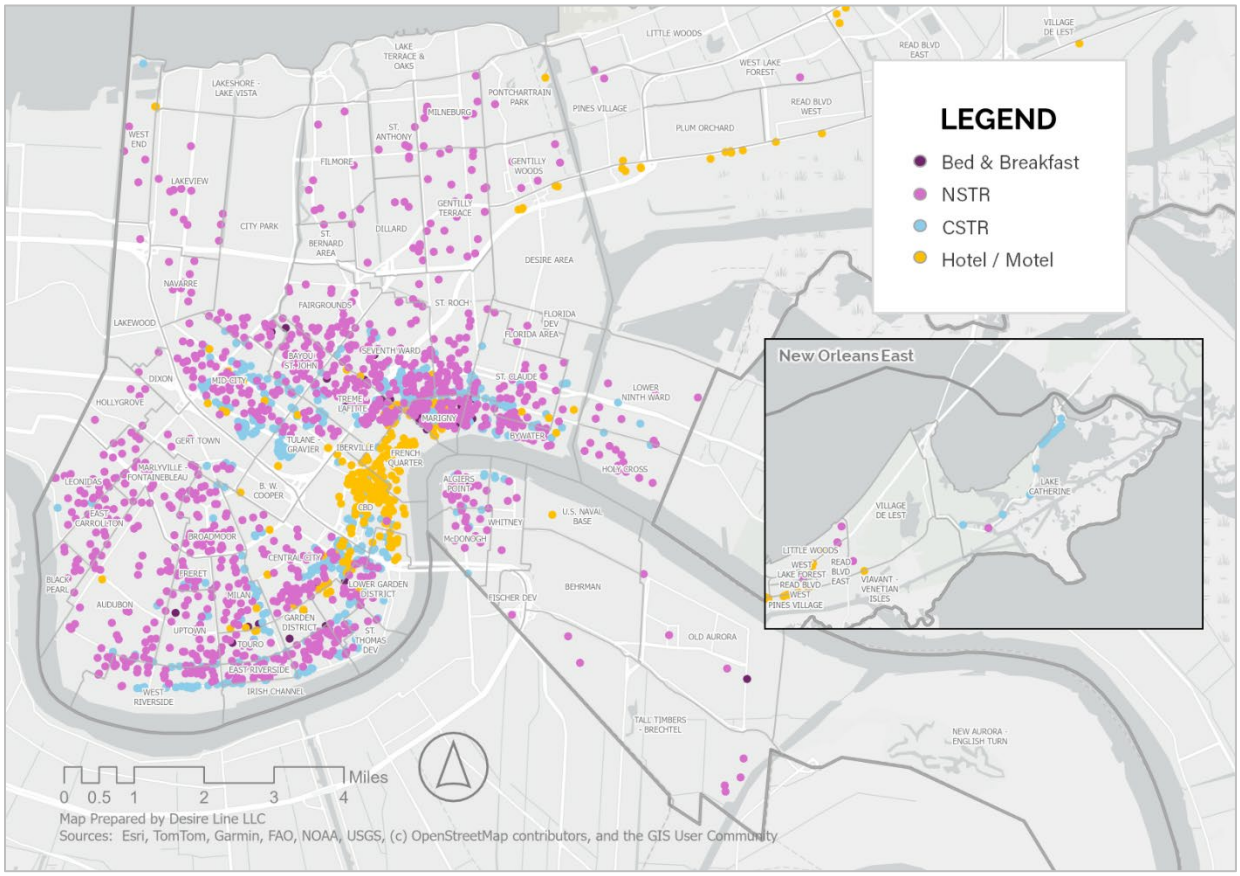
Nashville, New York City, Pacific Grove, Philadelphia, Portland, San Francisco, Santa Monica, Savannah, Seattle, and the State of Wisconsin. Unique standards (not currently within the City's requirements) include additional zoning restrictions, overlay districts, licenses and taxes, worker requirements, as well as parking, operations, and safety requirements.

4. Spatial Analysis

4.1 Citywide Spatial Analysis.

1. *Location matters*. Transient lodging uses are located throughout the City (**Figure 3**) and are concentrated within high tourist areas, predominantly in the Central Business District, Central City, Mid-City, the French Quarter, and the Lower Garden District. While Bed and Breakfasts and NSTRs are located primarily in residential areas, CSTRs and Hotels/Motels tend to be concentrated in commercial and mixed-use areas. *See **Sec. 6.7** in **Appendix A** for more detail, maps, and tables.*

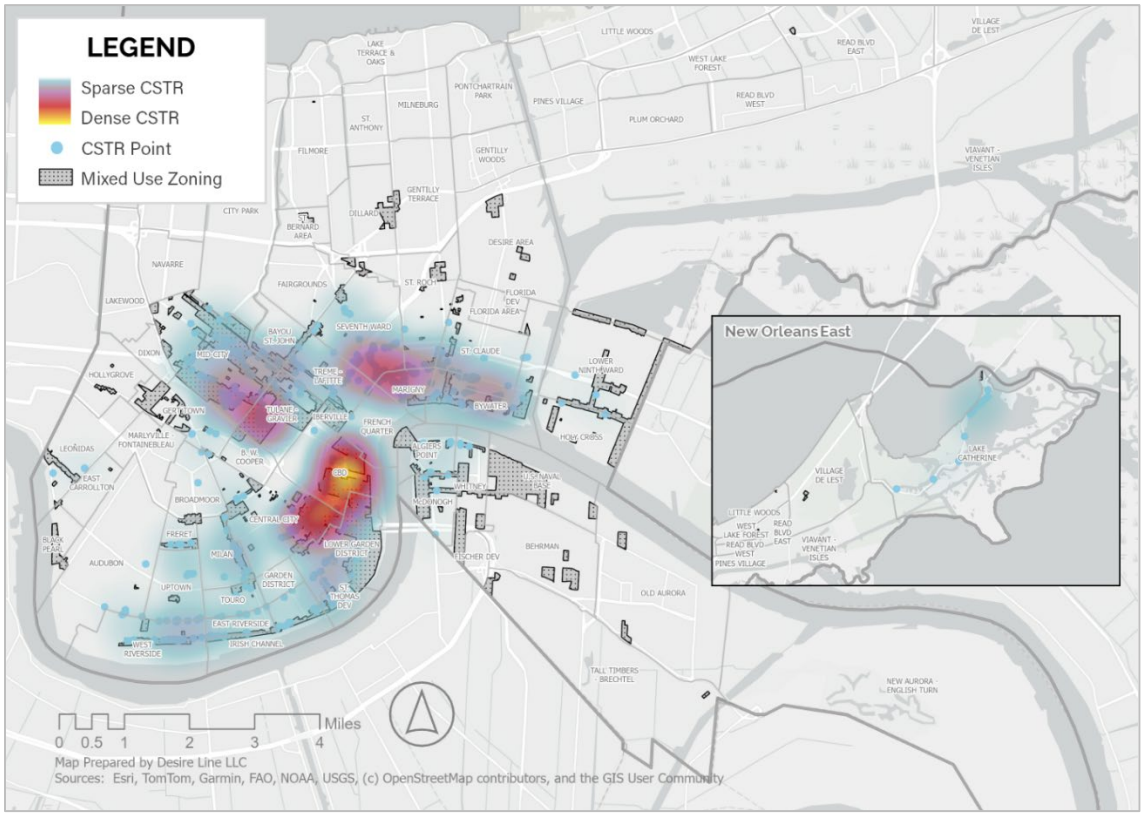
FIGURE 3. EXISTING, LICENSED TRANSIENT LODGING USES CITYWIDE.



2. *Type of STR matters.* CSTRs are only permitted in non-residential zoning districts. While these districts can be found in commercial areas and along commercial corridors, there are also neighborhoods that include large areas zoned for non-residential uses and areas that are zoned commercial or mixed-use that are developed with residential uses (**Figure 4**). Even so, most City

residents experience NSTRs in their neighborhoods – or a CSTR perceived to be an NSTR (**Figure 5**), which have notable concentrations in the Uptown, Downtown, and Mid-City. This conflation was repeatedly discussed as part of focus groups, stakeholder interviews, and community survey results.

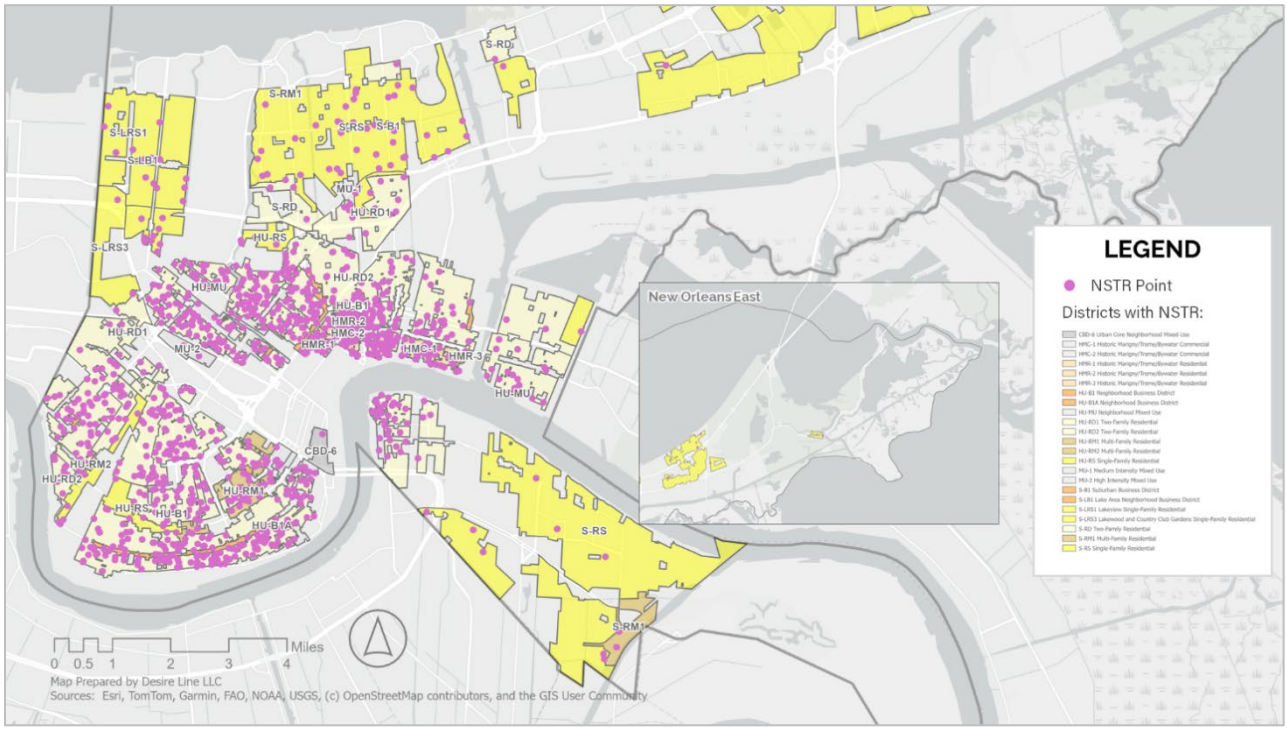
FIGURE 4: ACTIVE 2025 CSTR LICENSES IN RELATIONSHIP TO MIXED-USE DISTRICTS



Note: Figure 4 maps the following mixed-use zoning districts:

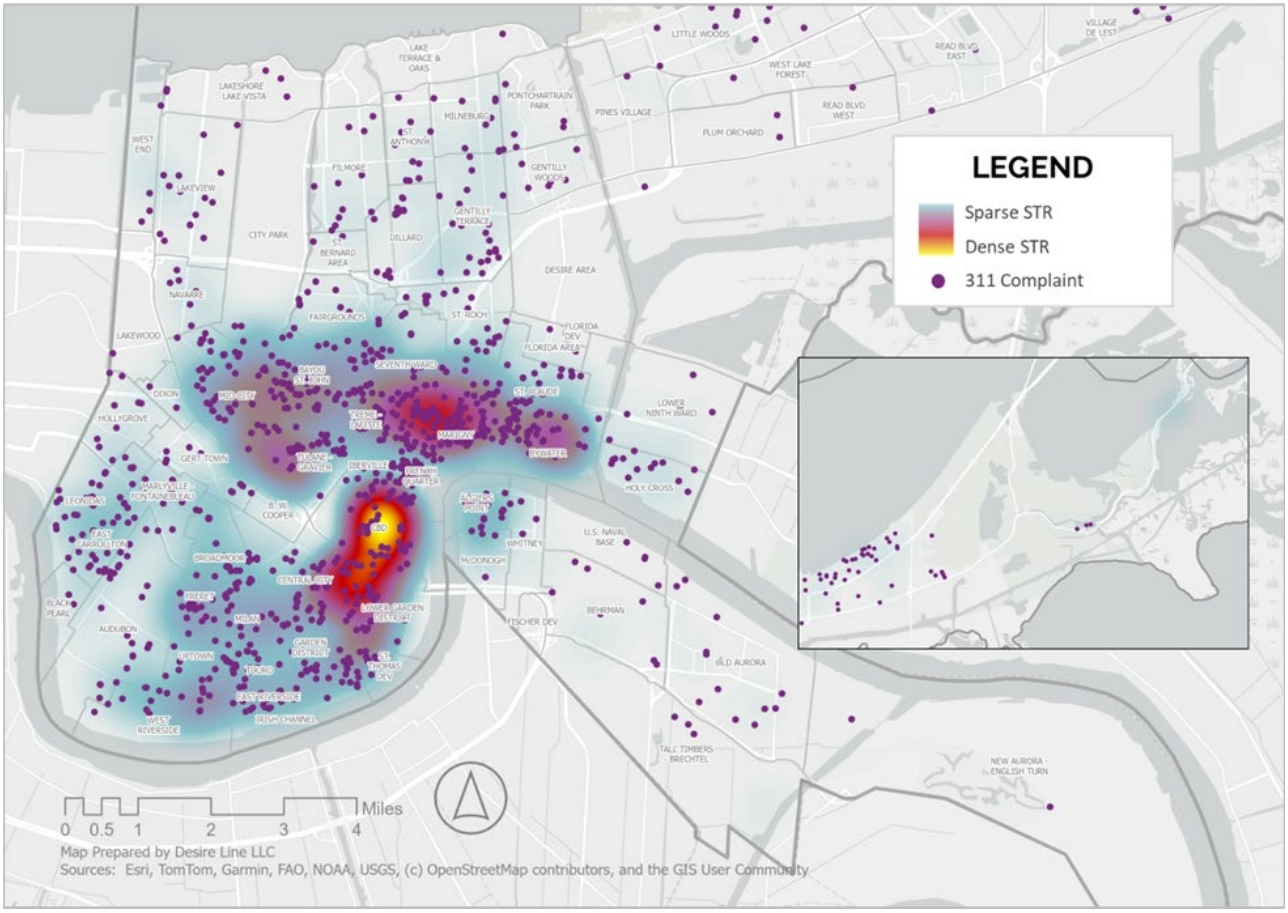
CBD-2	CBD-2 Historic Commercial and Mixed-Use District
CBD-5	CBD-5 Urban Core Neighborhood Lower Intensity Mixed-Use District
CBD-6	CBD-6 Urban Core Neighborhood Mixed-Use District
HM-MU	Historic Marigny/Tremé/Bywater Mixed-Use District
HU-MU	Historic Urban Mixed-Use District
HU-MU	Historic Urban Neighborhood Mixed-Use District
LI	Light Industrial District
LS	Life Science Mixed-Use District
M-MU	Maritime Mixed Use
MU-1	Medium Intensity Mixed-Use District
MU-2	High Intensity Mixed-Use
MU-2	High Intensity Mixed-Use District
S-MU	Suburban Neighborhood Mixed-Use District

FIGURE 5: ACTIVE NSTR PERMITS BY ZONING DISTRICT



3. *Noise complaints, STR complaints, and the effects of illegal STRs*. Based on data from 2021-2025, noise and STR complaints are more concentrated in the Central Business District, Central City, Lower Garden District and Marigny areas (**Figure 6**), which could suggest that existing CSTRs are generating nuisance activities. However, there is not a link between noise complaints and existing CSTRs beyond the general proximity of the uses and the complaints. It could also suggest that the high proliferation of illegal STRs (**Figure 7**) are further conflating residents' perceptions of CSTRs with legally operating STRs.

FIGURE 6: NOISE AND STR COMPLAINTS, 2021-2025[8]



[8] City of New Orleans. (2025). *311 Data.* https://datadriven.nola.gov/open-data/featured/311-calls/.

FIGURE 7: 7,552 NONCOMPLIANT STRS CITYWIDE (MARCH 2025)

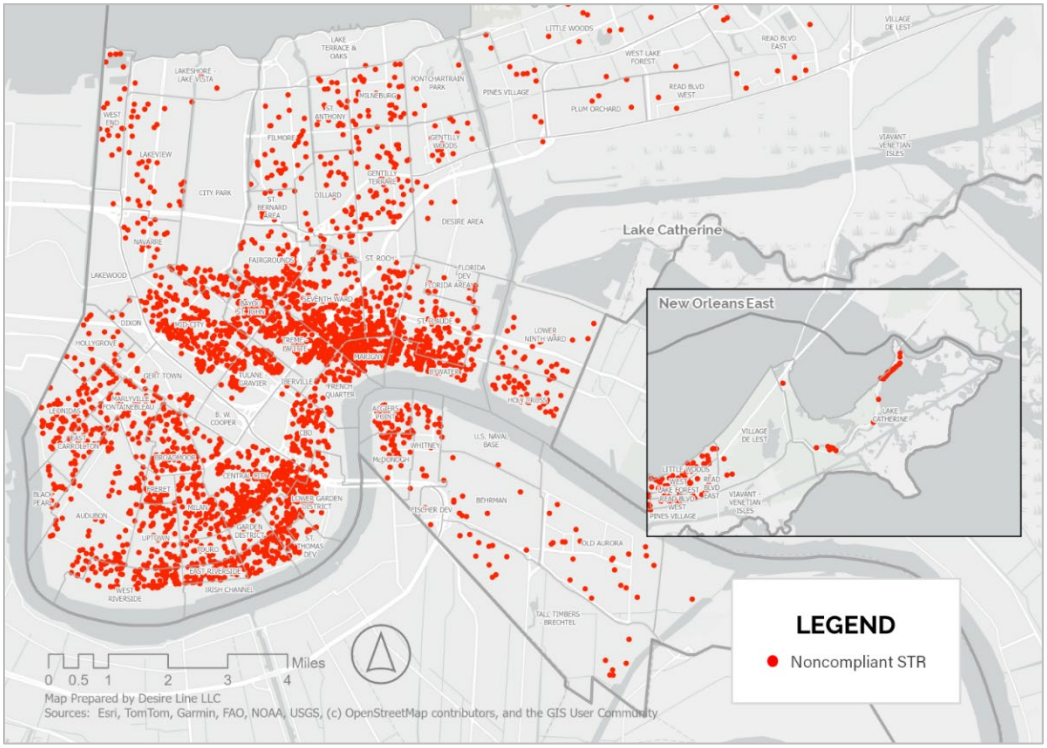
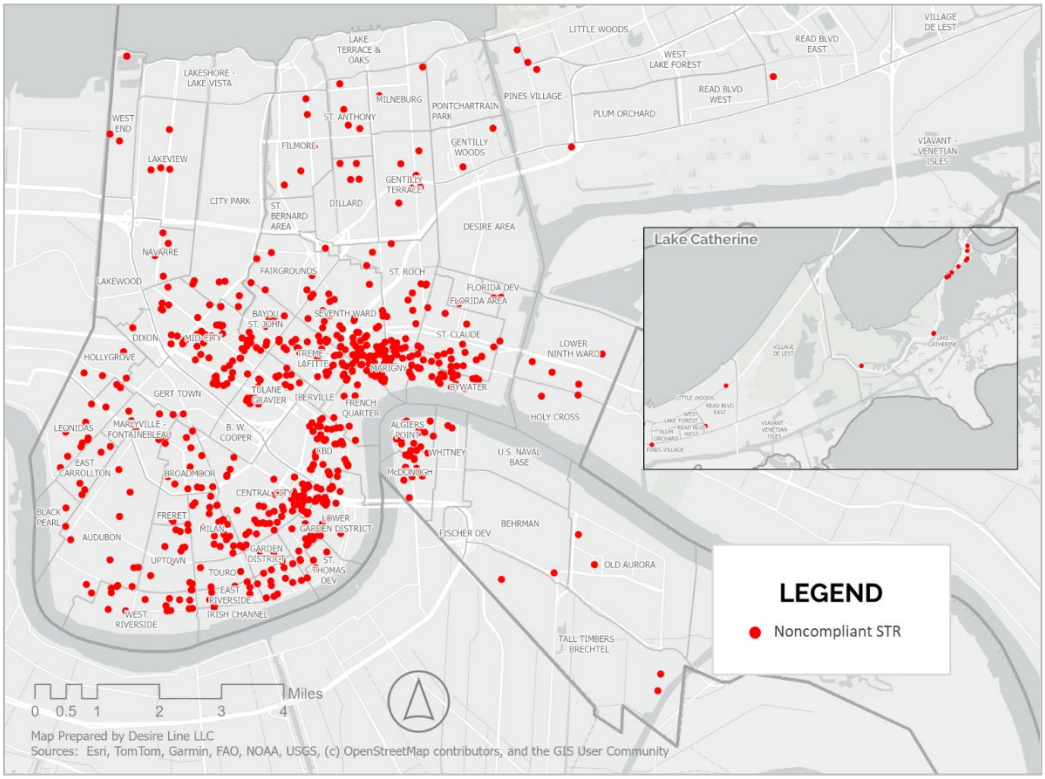


FIGURE 8: 905 NONCOMPLIANT STRS CITYWIDE (CURRENT)



4. *CSTRs and eviction data.* There is some significant overlap of CSTRs permits and evictions in the last year, specifically within the Marigny, Bywater, Warehouse District, Lower Garden District, and Central City neighborhoods. **Figure 9** illustrates where current CSTRs are located with census blocks highlighted to show the number of recorded evictions in the last year.

FIGURE 9: CTSRs AND EVICTION DATA



4.2 Spatial Analysis of Community Survey Narrative Themes.

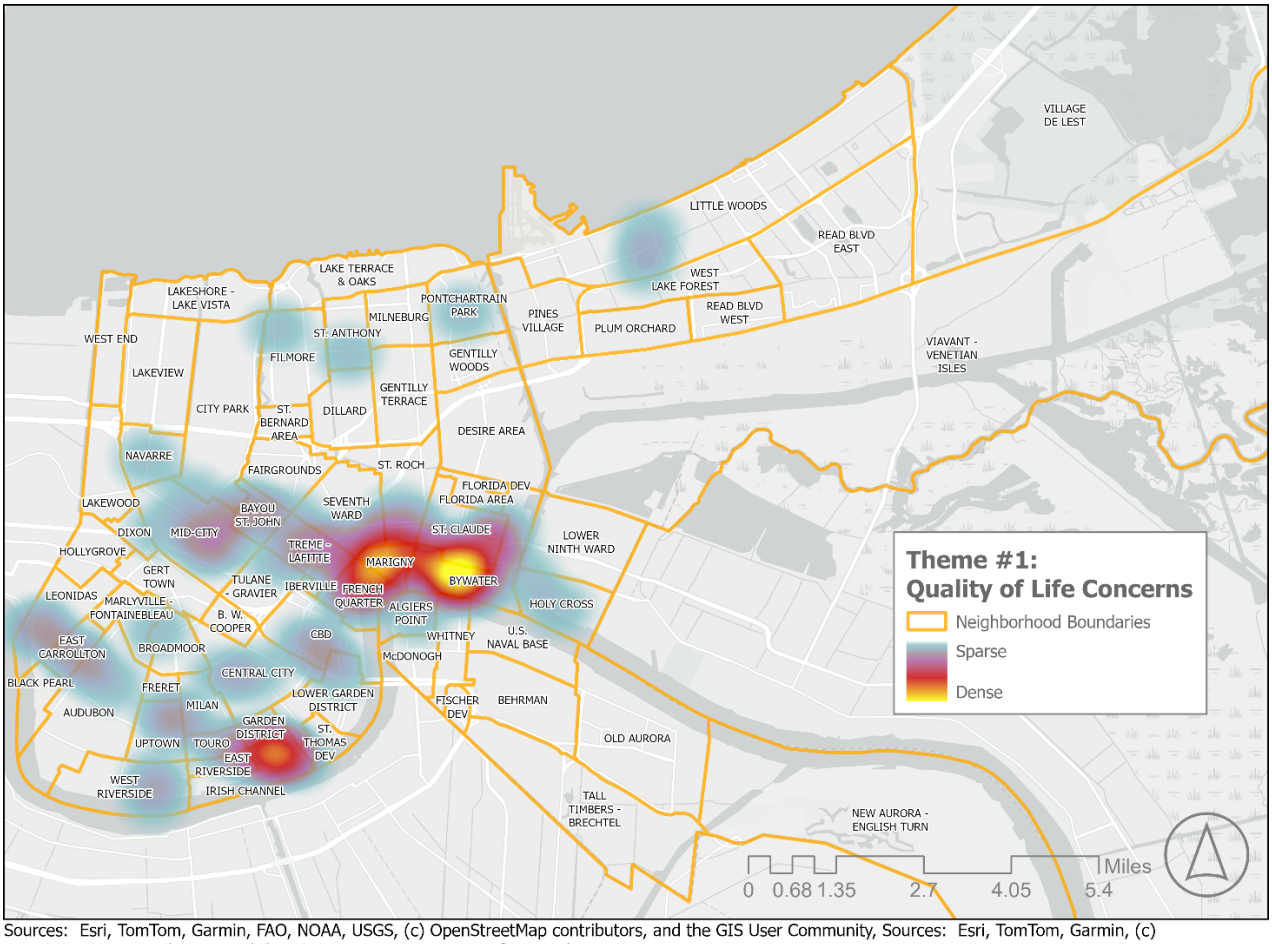
1. Community survey respondents had the opportunity to respond "other" and enter a narrative response to 9 survey questions. Additionally, the survey concluded with the opportunity for respondents to provide additional thoughts on transient lodging. In all, 514 "free response" narrative comments were submitted. Four themes emerged in the analysis of this feedback that reflect the diverse and often conflicting experiences residents have had with STRs across different parts of the City:

   - Housing affordability and displacement
   - Neighborhood quality of life
   - Enforcement and regulation
   - Economic opportunity

2. The Project Team tagged each comment, georeferenced the survey respondents' location, mapped each theme, then colored the map to reflect high concentrations of feedback to better understand how STR impacts were manifesting across the City. Each theme and key takeaway is summarized on the following pages.

3. *Narrative Theme 1: Quality of Life Concerns*. Most respondents expressed concern regarding numerous negative impacts to their quality of life due to STRs, where the highest concerns included "increased housing/rent costs," (54.52%), "loss of neighborhood character" (58.68%), and "more vacant or investor-owned properties" (60.00%). Quality of life issues were also a predominant theme in the free response section, reflected in 95 out of the 514 comments. These concerns were most elevated in the Bywater, Marigny, and Garden District neighborhoods and shown in **Figure 10.**

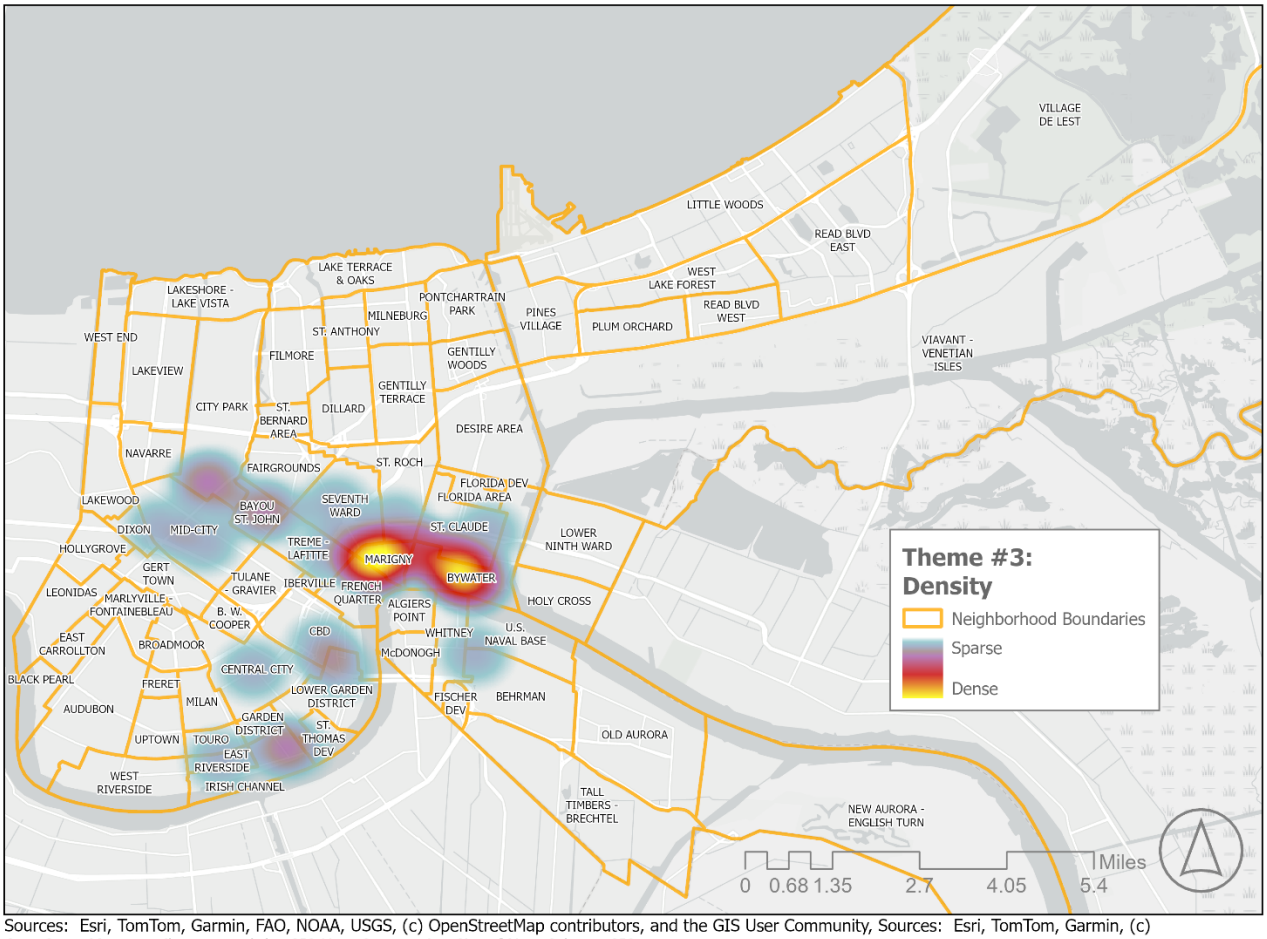
FIGURE 10: OUTREACH SPATIAL ANALYSIS
NARRATIVE THEME 1: QUALITY OF LIFE CONCERNS



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community, City of New Orleans GIS,
Map Prepared by Desire Line LLC

4. *Narrative Theme 2: Density of STRs in the Community.* Many respondents emphasized the negative impact that clusters of STRs have on neighborhood stability and community character. The heat map in **Figure 11** shows density-related complaints are especially concentrated in the Marigny and Bywater neighborhoods. Moderate densities of complaints are also visible in Mid-City, Bayou St. John, and portions of the Lower Garden District and Irish Channel neighborhoods. These hot spots correlate with areas with high numbers of STRs according to City sources.

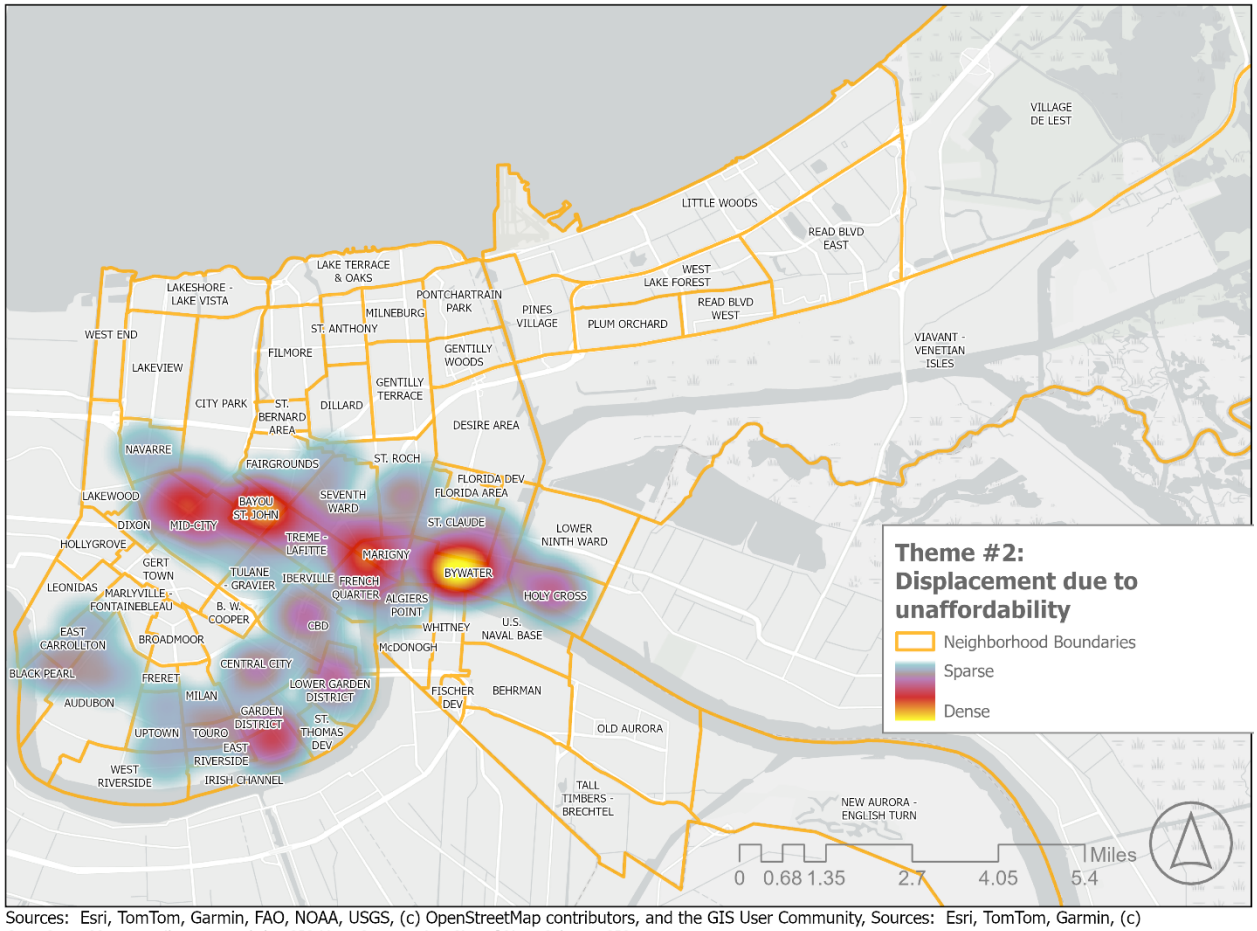
FIGURE 11: OUTREACH SPATIAL ANALYSIS
NARRATIVE THEME 2: DENSITY OF STRS IN THE COMMUNITY



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community, City of New Orleans GIS,
Map Prepared by Desire Line LLC

5. *Narrative Theme 3: Displacement due to Unaffordability.* The majority of both homeowners and renters, 69.84%, acknowledged that their property value or rent had increased, but this was rarely seen as a good thing. Displacement was a particularly urgent concern. Over a quarter of respondents (27.28%), 344 individuals, reported that they or someone they knew had been evicted from a unit that is now being used as a CSTR. These incidents have reportedly become more frequent in recent years. In free response comments, 85 out of 514 respondents raised issues related to the displacement of locals, the loss of affordable housing, and the weakening of neighborhood identity and cohesion.

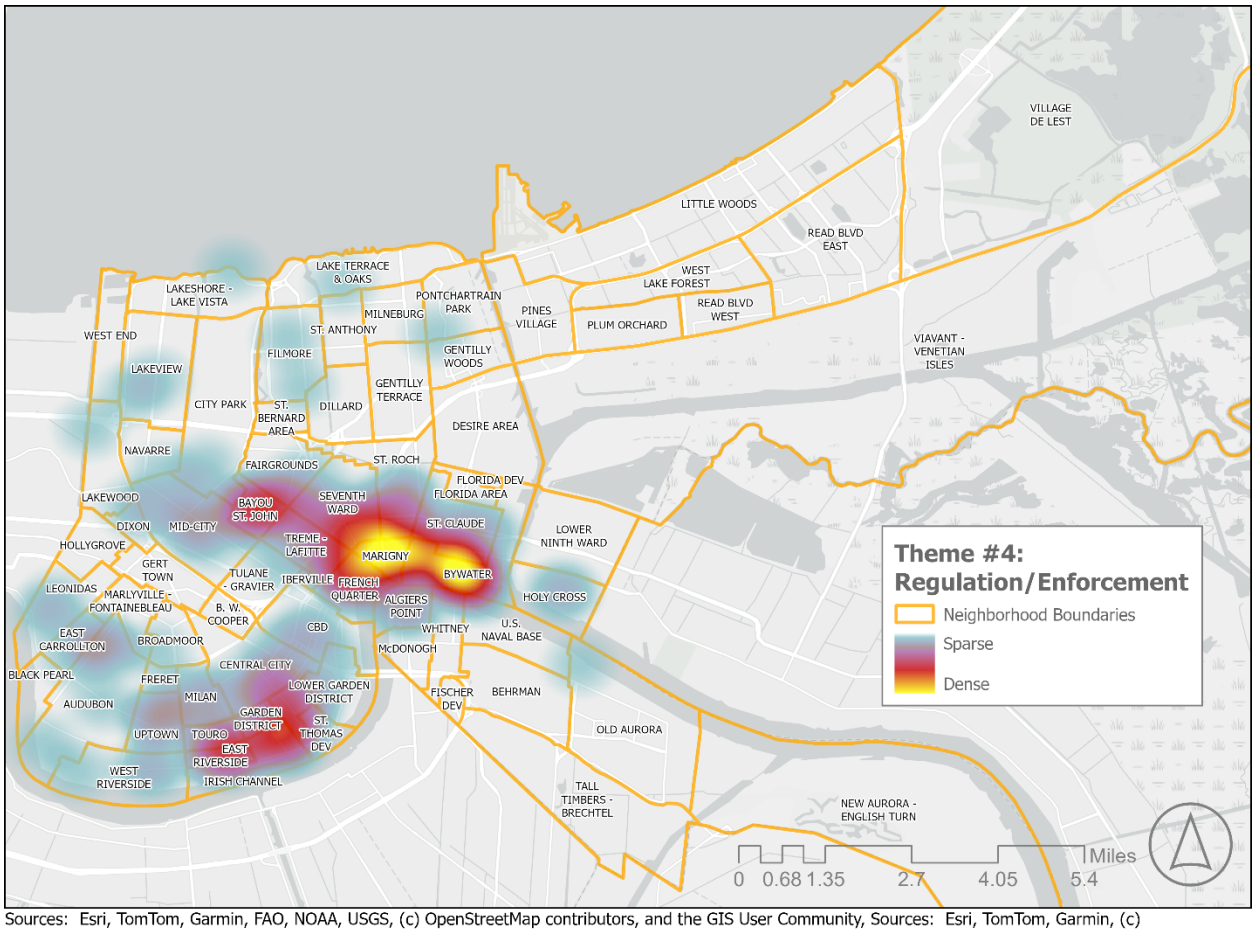
FIGURE 12: OUTREACH SPATIAL ANALYSIS
NARRATIVE THEME 3: DISPLACEMENT DUE TO UNAFFORDABILITY



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community, City of New Orleans GIS,
Map Prepared by Desire Line LLC

6. *Narrative Theme 4: Regulation and Enforcement.* The most pervasive theme among respondents' free responses, appearing in 212 out of 514 comments, concerned regulations and enforcement of STRs. While the survey data provided some insight into public opinion about the focus of existing regulations, the highest priorities for many were stopping the operation of illegal STRs (72.80%) and preserving housing for year-round residents of New Orleans (62.65%). Respondents spoke more frequently about enforcement of regulations rather than the regulations themselves, with this concern particularly strong in the Marigny and Bywater neighborhoods, though it was also echoed in the Garden District and Irish Channel as seen in **Figure 13.**

FIGURE 13: OUTREACH SPATIAL ANALYSIS
NARRATIVE THEME 4: DISPLACEMENT DUE TO UNAFFORDABILITY



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community, City of New Orleans GIS,
Map Prepared by Desire Line LLC

4.3 Neighborhood Specific Analysis

1. *Methodology.*

   a. *Neighborhood typologies.* Upon reviewing the survey responses alongside City data from the Granicus dashboard, 311 call histories, and past permit issuance for transient lodging uses, three types of neighborhoods emerged based on the impact of transient lodging use in the area: *higher impact, moderate impact, and lower impact.* Recognizing that different parts of the City have different challenges associated with transient lodging, these categories assisted the Project Team in considering the regulatory framework needed to manage those challenges.

   - **Higher Impact:** Areas with the most STR units and high neighborhood engagement on quality-of-life issues. Neighborhoods in this category are in the upper quintile (top 20%) for number of STR units (per Granicus dashboard) and the upper quintile (top 20%) for number of community survey responses, short-form narrative engagement on the community survey, or 311 complaints related to short-term lodging. These neighborhoods include (but are not limited to) the Central Business District, Bywater, Marigny, and Seventh Ward.
   - **Moderate Impact:** Areas with the most STR units or high neighborhood engagement on quality-of-life issues. Neighborhoods in this category are in the upper quintile (top 20%) for number of STR units (per Granicus dashboard) OR are the upper quintile (top 20%) for number of community survey responses, short-form narrative engagement on the community survey, or 311 complaints related to short-term lodging. These neighborhoods include (but are not limited to) Algiers Point, East Riverside, and Uptown.
   - **Lower Impact:** All remaining neighborhoods in the City.

Surveys Received by Neighborhood

Neighborhood	Count
MARIGNY	91
BYWATER	91
FRENCH QUARTER	58
SEVENTH WARD	58
MID-CITY	52
BAYOU ST. JOHN	45
IRISH CHANNEL	40
CITY PARK	38
CENTRAL CITY	38
TREME - LAFITTE	36
ST. CLAUDE	35
LOWER GARDEN DISTRICT	29
ST. ROCH	28
AUDUBON	27
UPTOWN	21
LEONIDAS	19
WEST RIVERSIDE	18
ALGIERS POINT	18
CBD	17
EAST RIVERSIDE	16
HOLY CROSS	14
FAIRGROUNDS	14
TULANE – GRAVIER	13
GARDEN DISTRICT	13
EAST CARROLLTON	13
MILAN	12
TOURO	12
FILMORE	9
GENTILLY TERRACE	9
LAKE CATHERINE	9
BROADMOOR	9
LITTLE WOODS	8
NAVARRE	8
LAKEVIEW	8
LAKESHORE - LAKE VISTA	6
MARLYVILLE - FONTAINEBLEAU	5
ST. THOMAS DEV	5
FRERET	5
LAKE TERRACE & OAKS	5
WEST END	4
McDONOGH	3
BEHRMAN	3
DILLARD	3
BLACK PEARL	3
WHITNEY	3
B. W. COOPER	2
FLORIDA AREA	2
DIXON	2
HOLLYGROVE	2
OLD AURORA	2
ST. ANTHONY	2
TALL TIMBERS - BRECHTEL	2
PONTCHARTRAIN PARK	2
MILNEBURG	1
ST. BERNARD AREA	1
LOWER NINTH WARD	1
WEST LAKE FOREST	1
LAKEWOOD	1
DESIRE	0
FISCHER DEV	0
GENTILLY WOODS	0
GERT TOWN	0
IBERVILLE	0
NEW AURORA/ ENGLISH TURN	0
PINES VILLAGE	0
PLUM ORCHARD	0
READ BLVD EAST	0
READ BLVD WEST	0
US NAVAL SUPPORT AREA	0
VIAVANT/VENETIAN ISLES	0
VILLAGE DE L'EST	0
(UNKNOWN)	176
Grand Total	**1166**

TABLE 3: NEIGHBORHOOD TYPOLOGY FOR ALL CITY NEIGHBORHOODS

HIGHER IMPACT	MODERATE IMPACT	LOWER IMPACT	
Audubon	Algiers Point	B. W. Cooper	Lower Ninth Ward
Bayou St. John	City Park	Behrman	Marlyville – Fontainebleau
Broadmoor	East Riverside	Black Pearl	McDonogh
Bywater	French Quarter	Desire	Milneburg
Central Business District	Gentilly Terrace	Dillard	Navarre
Central City	Holy Cross	Dixon	New Aurora – English Turn
Irish Channel	Milan	East Carrollton	Old Aurora
Lower Garden District	St. Thomas Development	Fairgrounds	Pines Village
Marigny	Uptown	Filmore	Plum Orchard
Mid-City	West Riverside	Fischer Dev	Pontchartrain Park
Seventh Ward		Florida Area	Read Blvd East
St. Claude		Freret	Read Blvd West
St. Roch		Garden District	St. Anthony
Treme - Lafitte		Gentilly Woods	St. Bernard Area
Tulane - Gravier		Gert Town	Tall Timbers - Brechtel
		Hollygrove	Touro
		Iberville	U.S. Naval Base
		Lake Catherine	Viavant - Venetian Isles
		Lake Terrace & Oaks	Village De L'Est
		Lakeshore - Lake Vista	West End
		Lakeview	West Lake Forest
		Lakewood	Whitney
		Leonidas	
		Little Woods	

2. *Existing neighborhood conditions, re: prevalence of transient lodging uses.* The remainder of this section includes an analysis of how transient lodging uses currently manifest across three individual neighborhoods: the Bywater (high impact), the French Quarter and Algiers Point (moderate impact), and Lake Catherine (lower impact). These neighborhoods are not intended to be representative of all neighborhoods within each typology. Examples provided aim to explain generally how city neighborhoods are unique and how the Project Team conducted its detailed analysis to fully appreciate the outcomes of zoning recommendations. To this effect, **Section 7.2 – Neighborhood Analysis: Recommendations' Effect**, extends this analysis to how proposed land use recommendations impact these areas.

3. *High impact neighborhood analysis:* The neighborhood selected to show the high impact analysis is the Bywater (existing transient lodging uses: **130**; Survey responses: **91**). The Bywater is located along the Mississippi River downriver of the French Quarter near the Industrial Canal.

a. There are currently **4** Bed and Breakfasts (dark purple, **Figure 14**) in the Bywater neighborhood that are located between St. Claude Avenue and Chartres Street. There are currently **46** NSTRs (light purple, **Figure 15**) in the Bywater neighborhood that are similarly located between St. Claude Avenue and Chartres Street, but also a few along Poland Avenue. There are currently **49** CSTRs (light blue, **Figure 16**) in the Bywater neighborhood that are similarly clustered between Chartres Street and St. Claude Avenue, with a few along Poland Avenue. There is currently **1** Hotel (yellow, **Figure 17**) in the Bywater neighborhood located near the Industrial Canal.



FIGURE 14: 4 BED AND BREAKFASTS IN THE BYWATER NEIGHBORHOOD

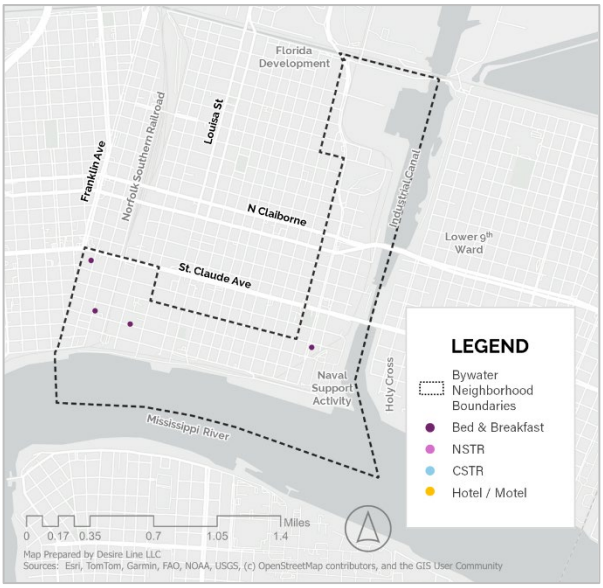


FIGURE 15: ADDITIONAL 46 NSTRS IN THE BYWATER NEIGHBORHOOD

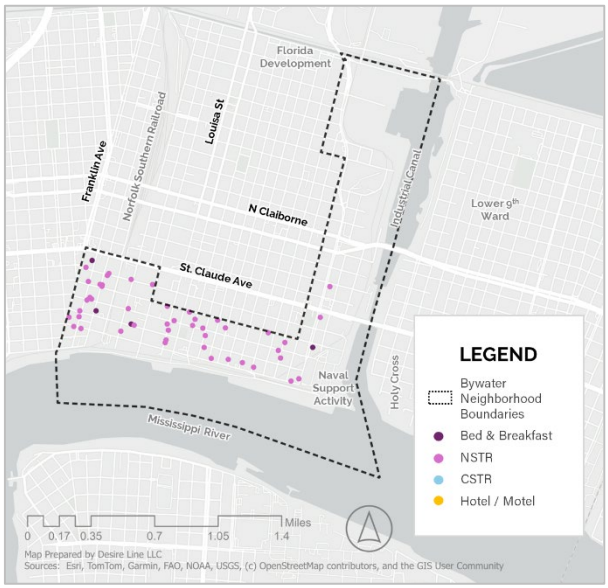


FIGURE 16: ADDITIONAL 49 CSTRS IN THE BYWATER NEIGHBORHOOD

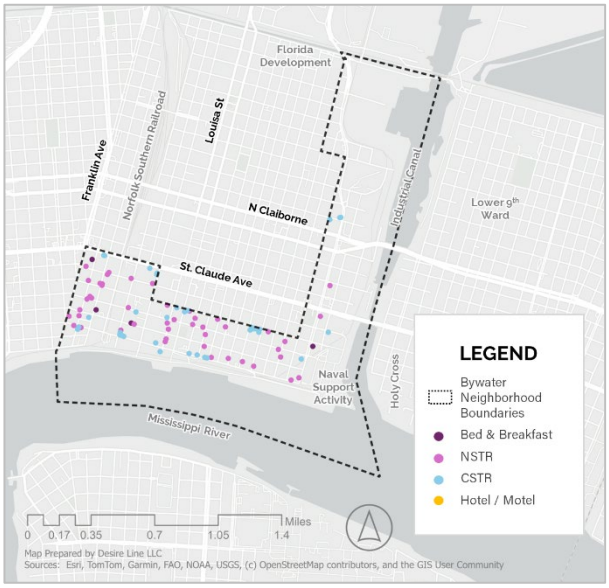


FIGURE 17: 1 ADDITIONAL HOTEL IN THE BYWATER NEIGHBORHOOD

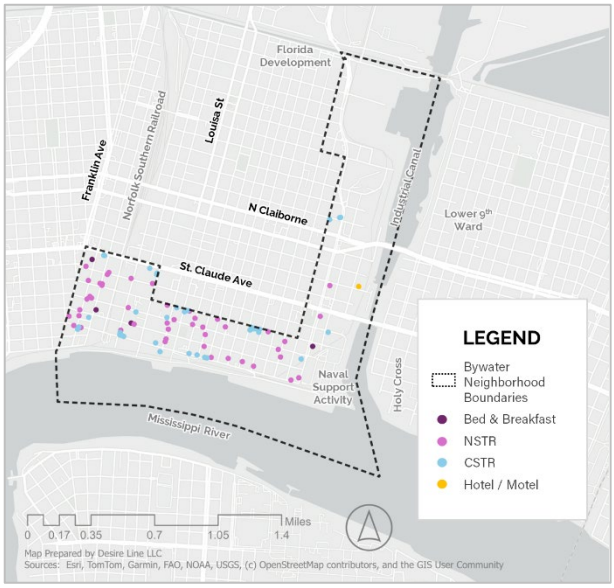
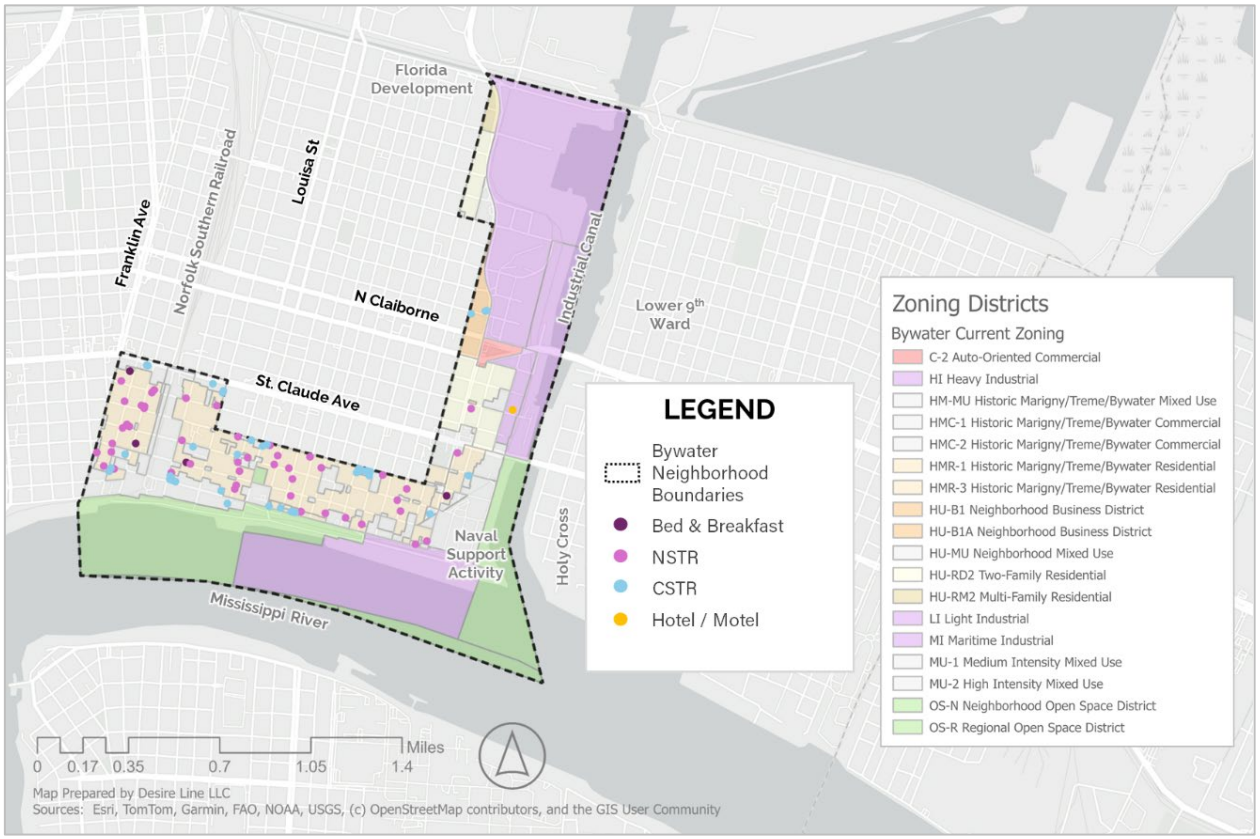


FIGURE 18: BYWATER CURRENT ZONING AND TRANSIENT LODGING USES



b. There were **199** Noncompliant STRs (red, **Figure 19**) in the Bywater neighborhood in March 2025 that were oftentimes very densely located, and similarly clustered between Chartres Street and St. Claude Avenue, but located throughout the neighborhood as well. That number was reduced to 30 Noncompliant STRs as a result of the United States District Court ruling in September 2025[9] (red, **Figure 20**) in the Bywater neighborhood that are primarily located between Chartres Street and St. Claude Avenue.

FIGURE 19: ADDITIONAL 199 NONCOMPLIANT STRs IN THE BYWATER NEIGHBORHOOD
(MARCH 2025)

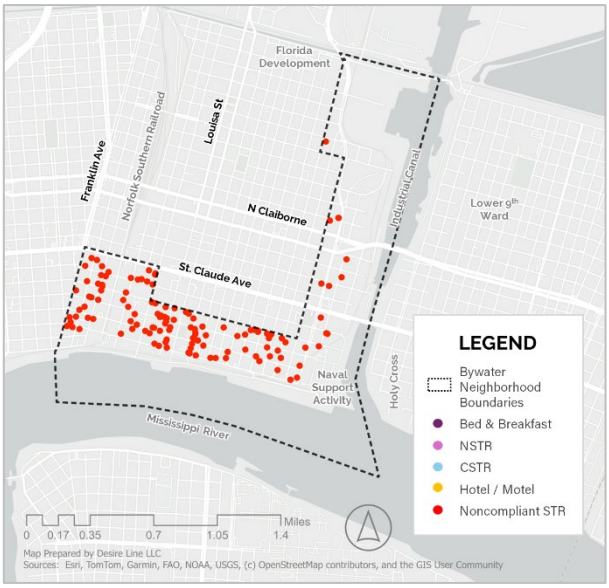
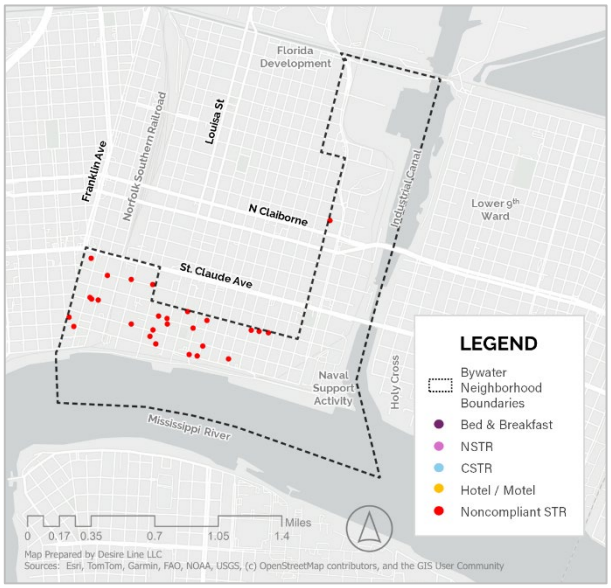


FIGURE 20: ADDITIONAL 30 NONCOMPLIANT STRs IN THE BYWATER NEIGHBORHOOD
(CURRENT)



c. Of the total transient lodging uses in the Bywater (130), most are CSTRs (49; 38%), followed by NSTRs (46; 35%); Noncompliant STRs (30; 23%), Bed and Breakfasts (4; 3%), and Hotels/Motels (1; 1%). The significant concentration of STRs, whether CSTR, NSTR, or noncompliant, coupled with the neighborhood's higher impact classification, indicates a need to limit further STR expansion in this area.

[9] Bret Bodin, et al. v. the City of New Orleans, 2025.

4. *Moderate impact neighborhood analysis*: The Algiers Point neighborhood was chosen as the first moderate impact example (Transient lodging uses: **46**; Survey responses: **18**). Algiers Point is located on the west bank of the Mississippi River across from the French Quarter.



   a. There are currently **2** Bed and Breakfasts (dark purple, **Figure 21**) in the Algiers Point neighborhood that are located on Bermuda Street and Olivier Street. There are currently **18** NSTRs (light purple, **Figure 22**) in the Algiers Point neighborhood that are located throughout the neighborhood. There are currently **8** CSTRs (light blue, **Figure 23**) in the Algiers Point neighborhood that are located along Opelousas Avenue, Patterson Road, and Elmira Avenue.

FIGURE 21: 2 BED AND BREAKFASTS IN THE ALGIERS POINT NEIGHBORHOOD



FIGURE 22: ADDITIONAL 18 NSTRS IN THE ALGIERS POINT NEIGHBORHOOD



FIGURE 23: ADDITIONAL 8 CSTRS IN THE ALGIERS POINT NEIGHBORHOOD

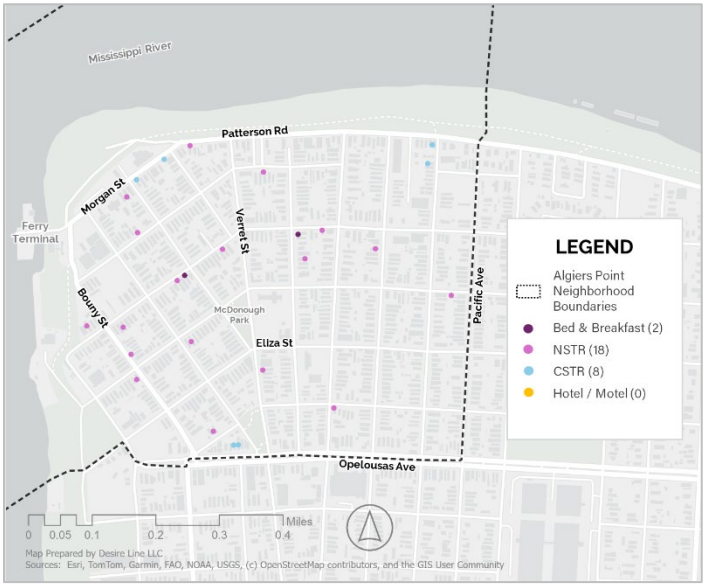
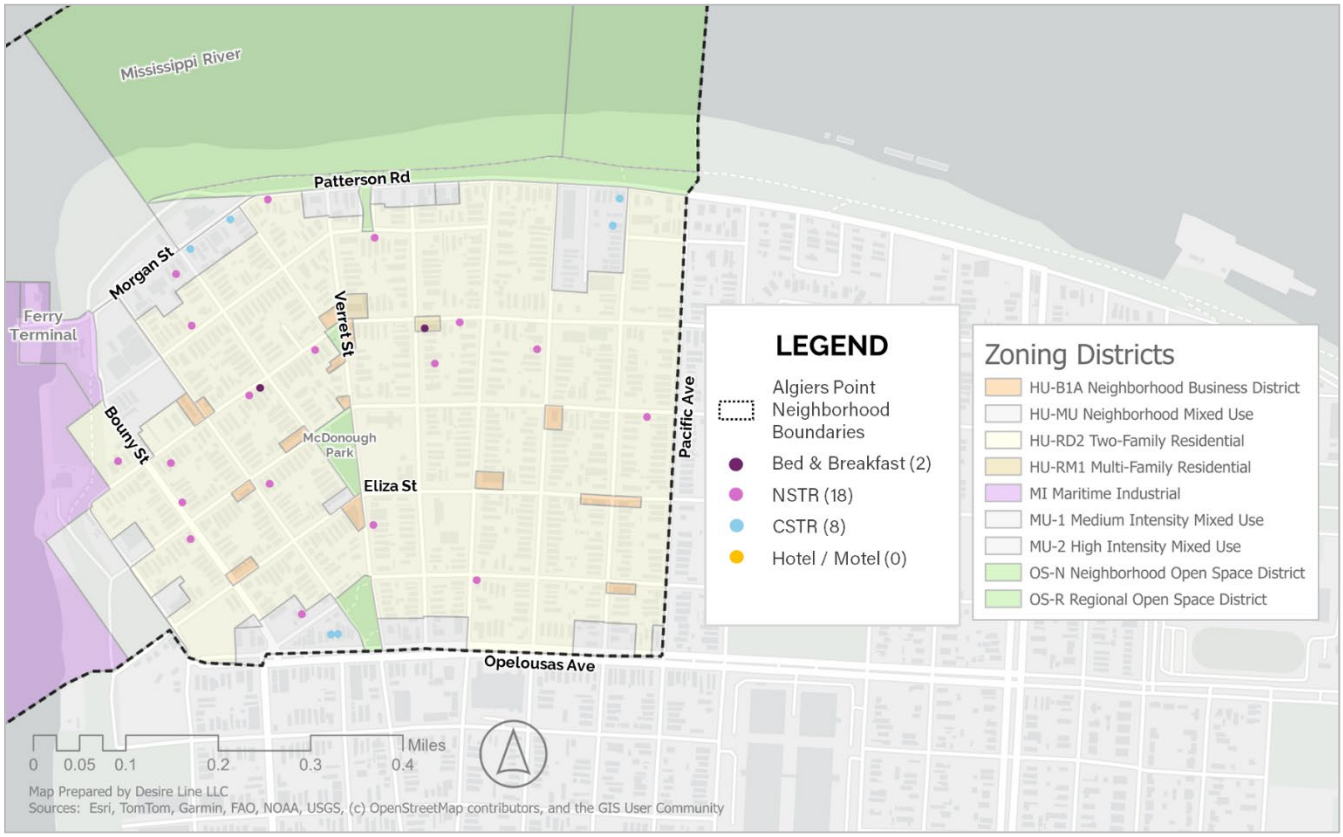


FIGURE 24: ALGIERS POINT CURRENT ZONING AND TRANSIENT LODGING USES



b. There were **64** Noncompliant STRs (red, **Figure 25**) in the Algiers Point neighborhood in March 2025 that were oftentimes very densely located and similarly located throughout the neighborhood. That number was reduced to **18** Noncompliant STRs as a result of the United States District Court ruling in September 2025[10] (red, **Figure 26**) in the Algiers Point neighborhood that are similarly located throughout the neighborhood.

FIGURE 25: ADDITIONAL 64 NONCOMPLIANT STRs IN THE ALGIERS POINT NEIGHBORHOOD (MARCH 2025)

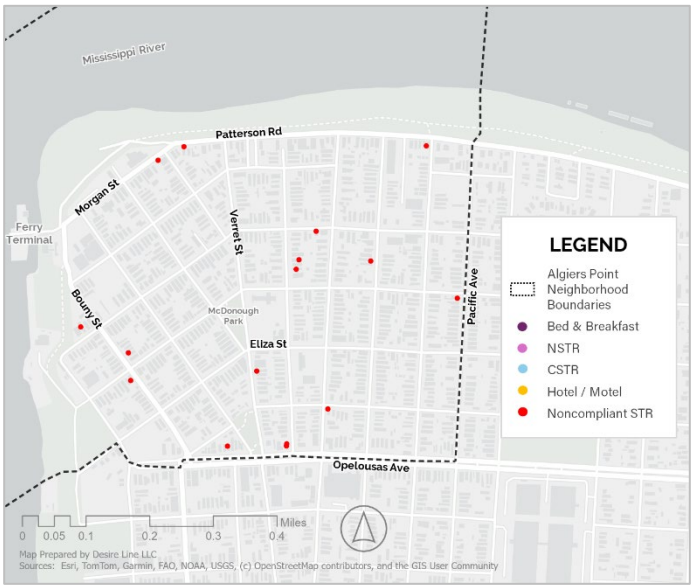
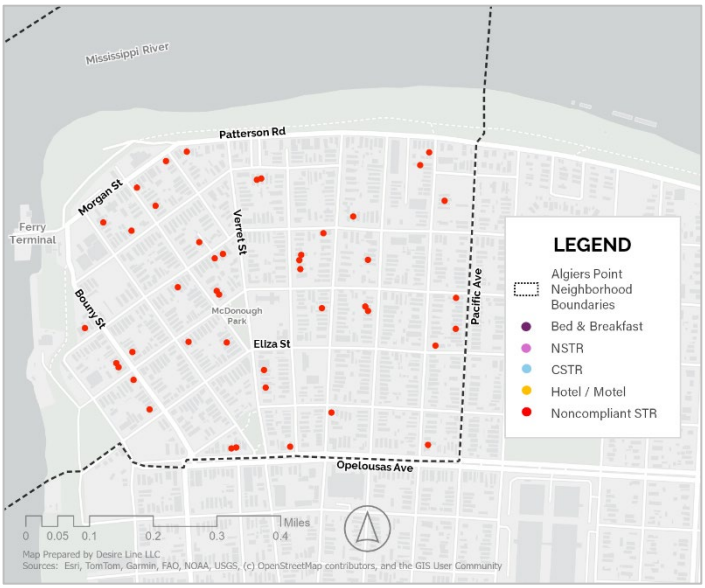


FIGURE 26: ADDITIONAL 18 NONCOMPLIANT STRs IN THE ALGIERS POINT NEIGHBORHOOD (CURRENT)



[10] Bret Bodin, et al. v. the City of New Orleans, 2025.

5. *Moderate impact neighborhood analysis:* The French Quarter neighborhood was chosen as the second moderate impact example (Transient lodging uses: **50**; Survey responses: **58**). The French Quarter is located on the Mississippi River between the Central Business District and the Marigny.



   a. There is currently **1** CSTR (light blue) in the French Quarter located on Toulouse Street (**Figure 27**). There are currently **43** legally nonconforming Hotels (yellow) in the French Quarter located throughout the neighborhood (**Figure 28**). Hotels are currently prohibited in the French Quarter.

FIGURE 27: 1 CSTR IN THE FRENCH QUARTER

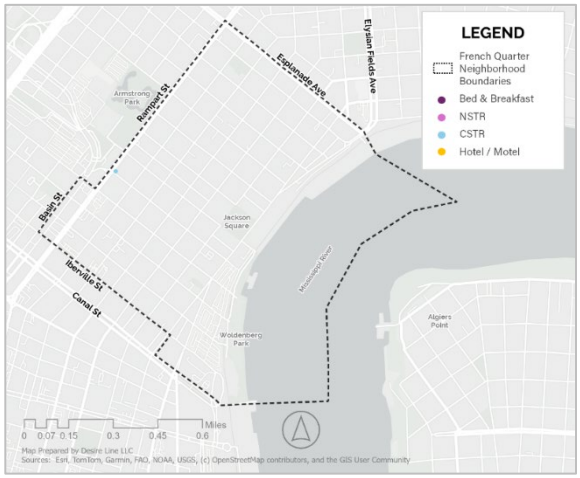


FIGURE 28: 43 ADDITIONAL HOTELS IN THE FRENCH QUARTER

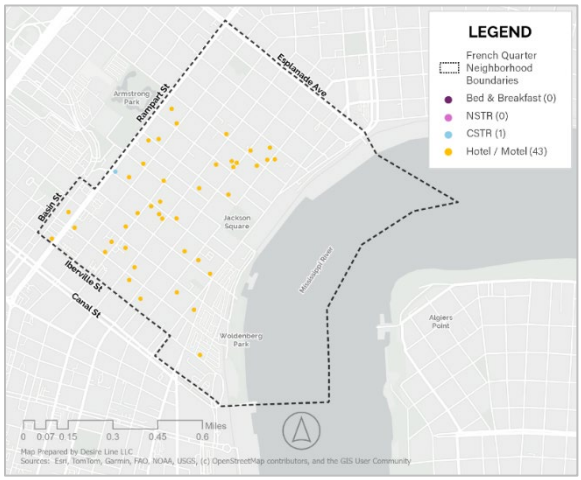
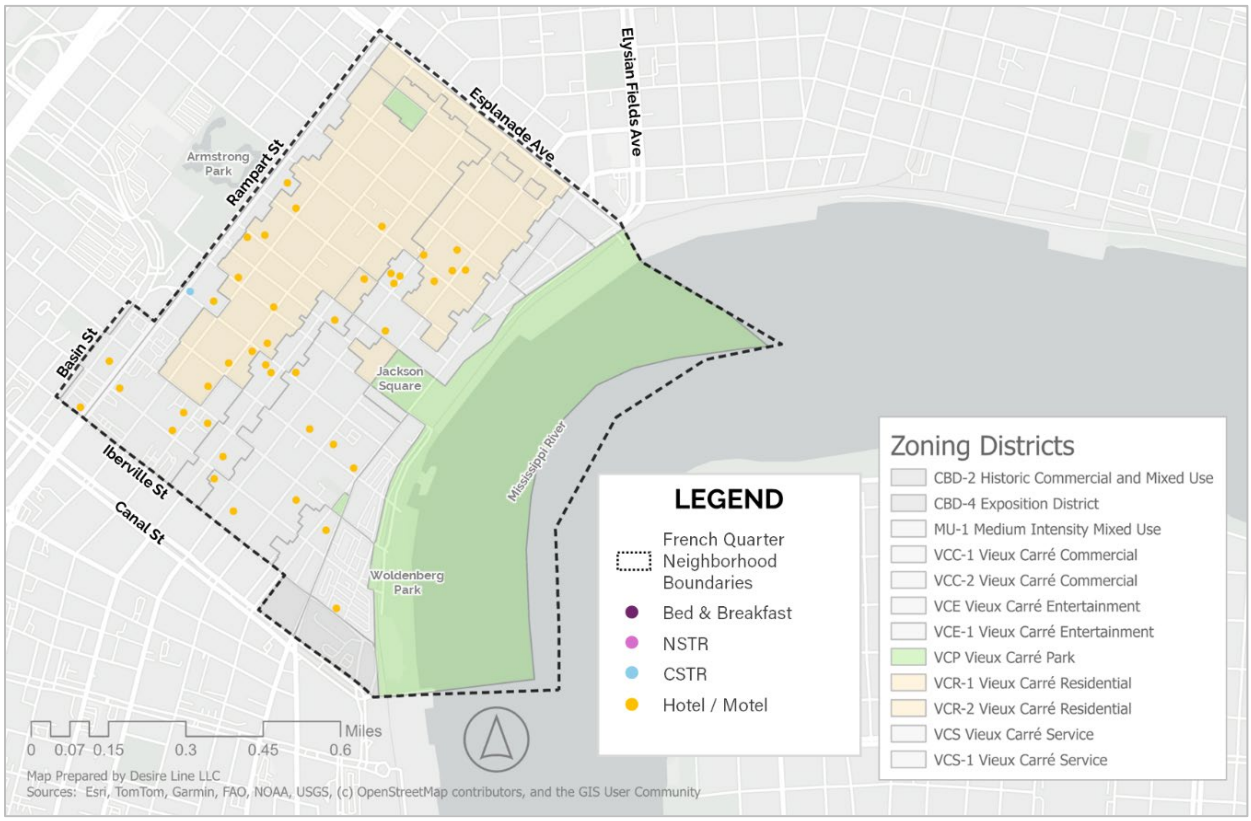


FIGURE 29: FRENCH QUARTER CURRENT ZONING AND TRANSIENT LODGING USES



b. There were **103** Noncompliant STRs (red) in the French Quarter in March 2025 that are located throughout the neighborhood (**Figure 30**). This number was reduced to **6** Noncompliant STRs in the French Quarter as a result of the United States District Court ruling in September 2025[11] that are similarly located throughout the neighborhood (**Figure 31**).

FIGURE 30: ADDITIONAL 103 NONCOMPLIANT STRs IN THE FRENCH QUARTER
(MARCH 2025)

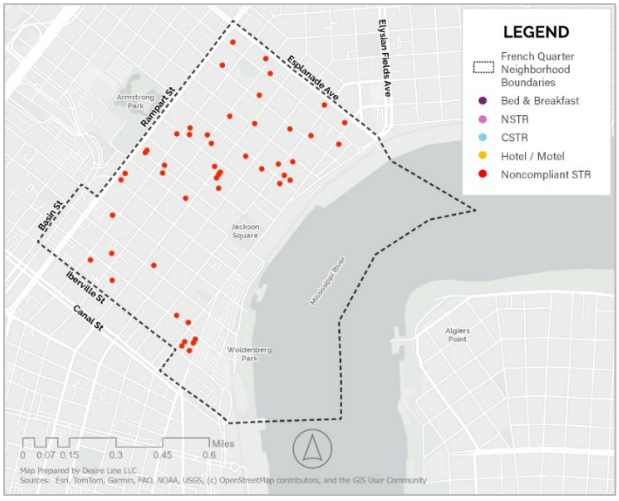
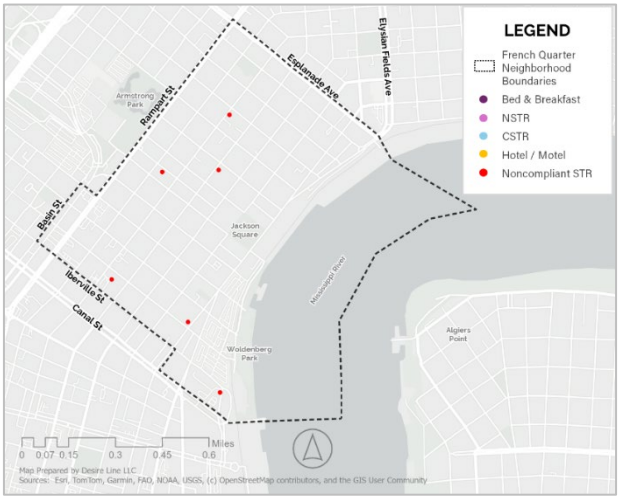


FIGURE 31: ADDITIONAL 6 NONCOMPLIANT STRs IN THE FRENCH QUARTER
(CURRENT)



c. Of the total transient lodging uses in the French Quarter (50), most are Hotels/Motels (43, 86%); followed by Noncompliant STRs (6; 12%), and CSTRs (1, 2%). These numbers suggest the current ban on new transient lodging uses in the French Quarter has been effective and limiting future development of transient lodging uses in this neighborhood may be appropriate.

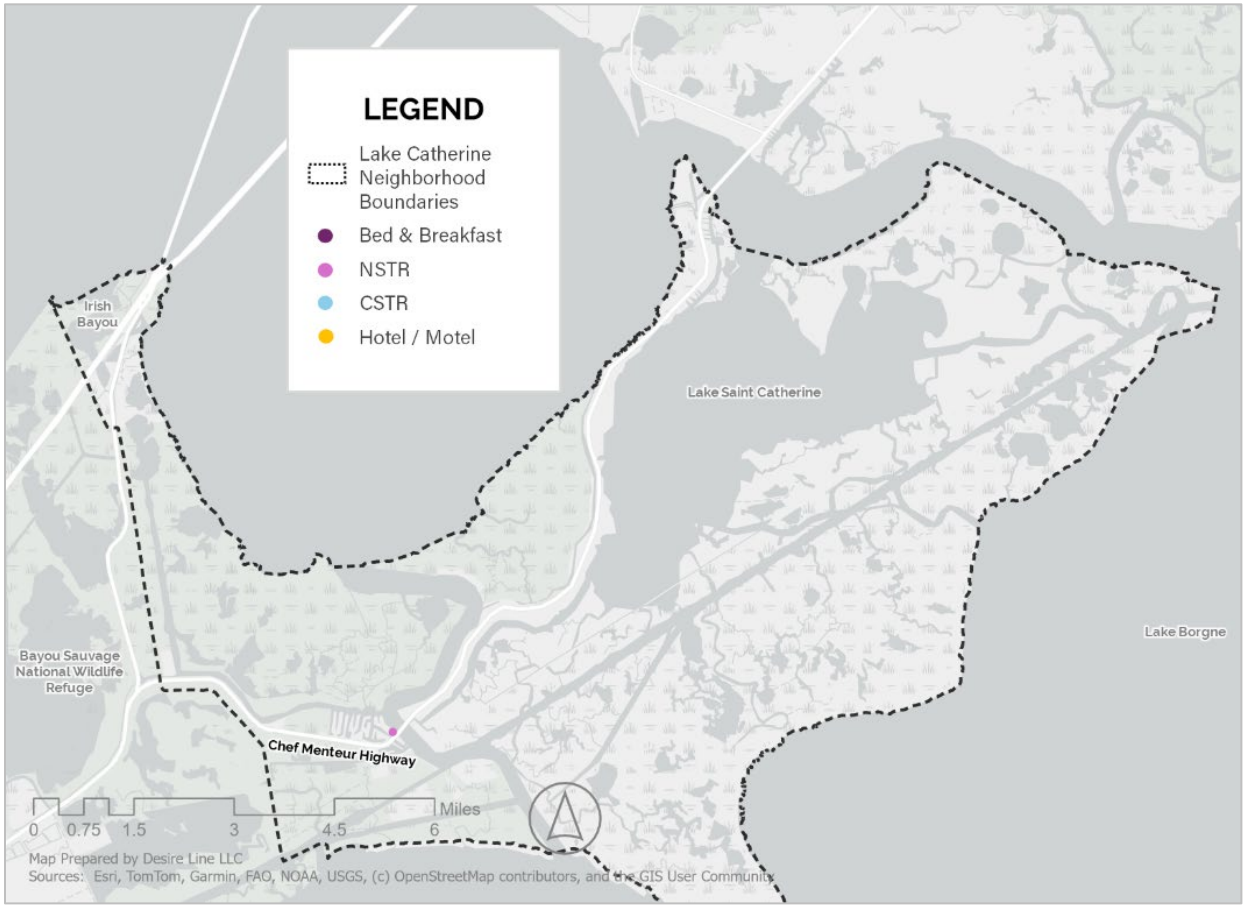
[11] Bret Bodin, et al. v. the City of New Orleans, 2025.

6. *Lower impact neighborhood analysis:* Lake Catherine was chosen as the lower impact neighborhood example (Transient lodging uses: **33**; Survey responses: **9**). Lake Catherine is located on the eastern edge of New Orleans, east of New Orleans East and close to Slidell.

   a. There is currently **1** NSTR (light purple, **Figure 32**) in Lake Catherine located on Chef Menteur Highway.

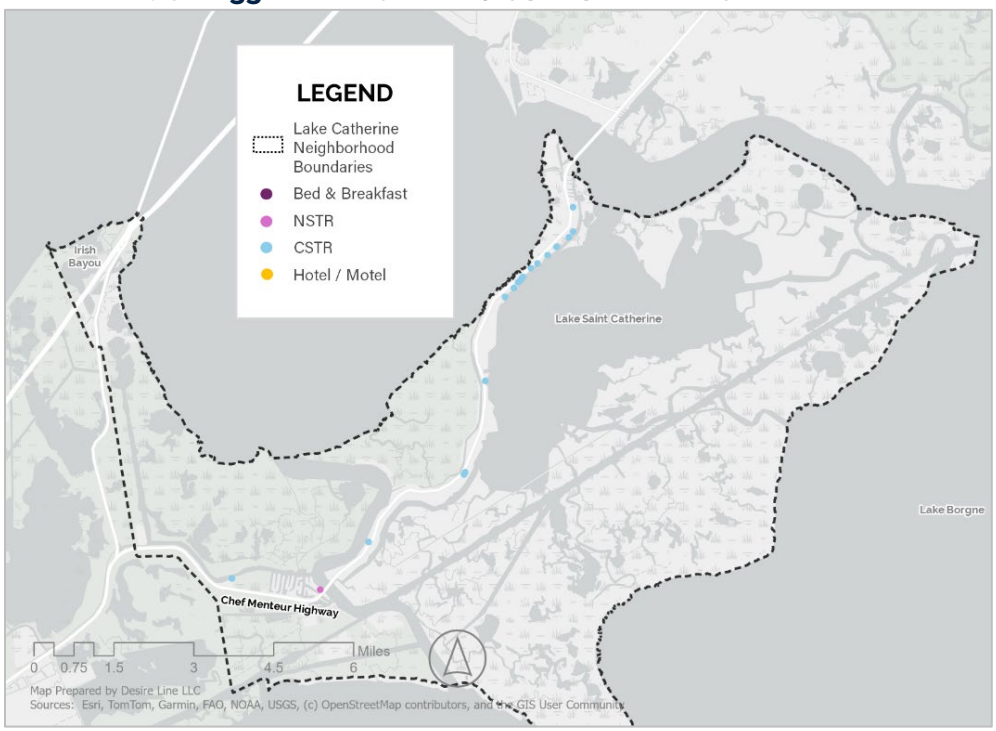


FIGURE 32: 1 NSTR IN LAKE CATHERINE



   b. There are currently **20** CSTRs (light blue, **Figure 33**) in Lake Catherine that are similarly located along Chef Menteur Highway.

FIGURE 33: ADDITIONAL 20 CSTRS in LAKE CATHERINE



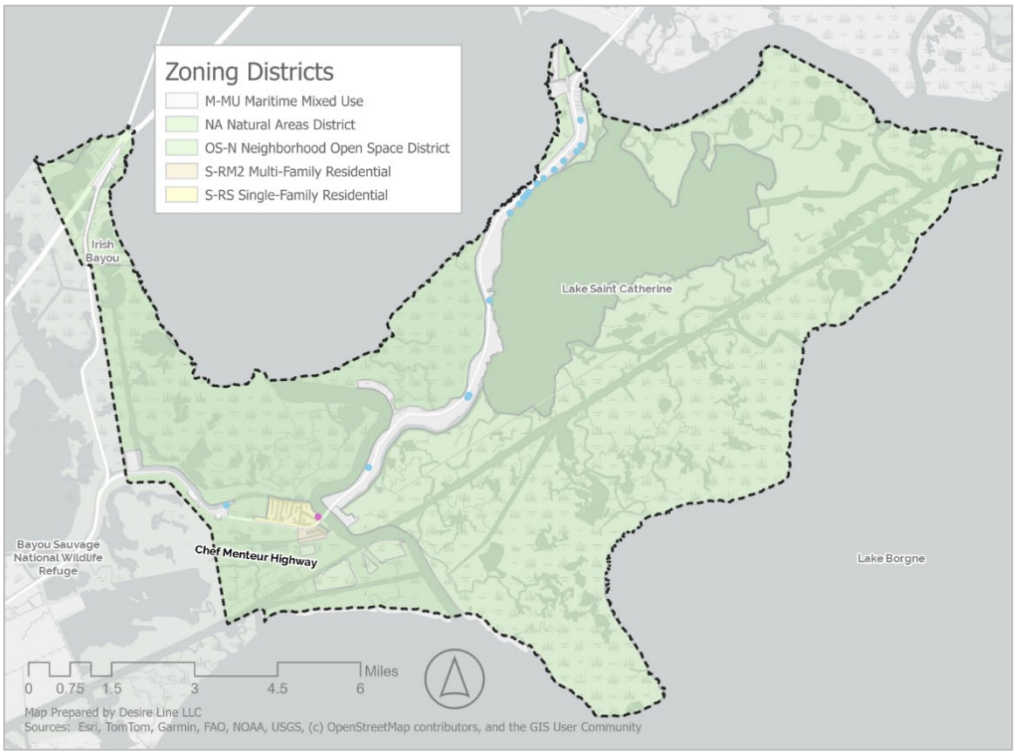
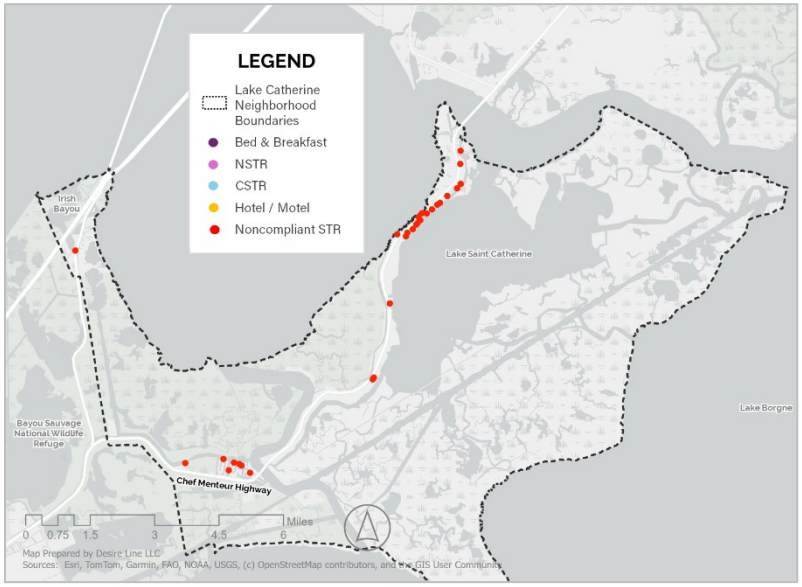


FIGURE 34: LAKE CATHERINE CURRENT ZONING AND TRANSIENT LODGING USES

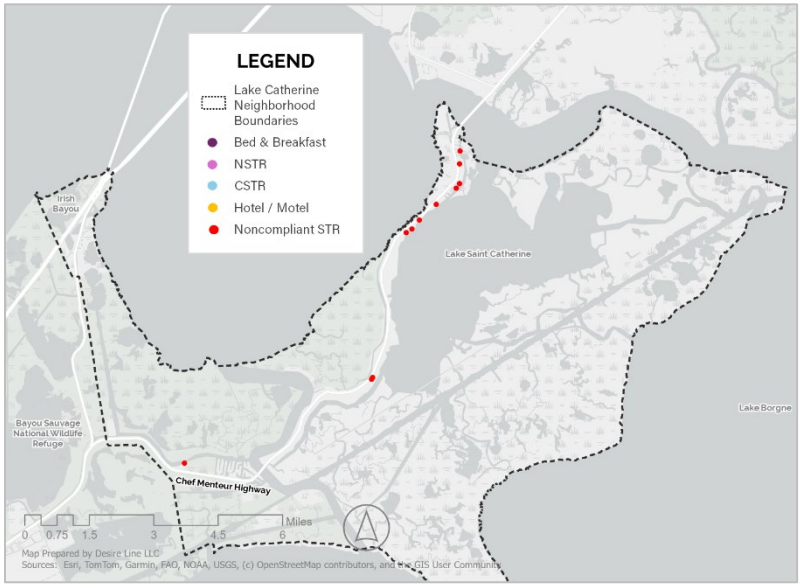
c. There were **54** Noncompliant STRs (red, **Figure 35**) in Lake Catherine in March 2025 that were densely clustered and similarly located along Chef Menteur Highway.

FIGURE 35: ADDITIONAL 54 NONCOMPLIANT STRs IN LAKE CATHERINE (MARCH 2025)



d. This number was reduced to **12** Noncompliant STRs as a result of the United States District Court ruling in September 2025[12] (red, **Figure 36**) in Lake Catherine that are similarly located along Chef Menteur Highway.

FIGURE 36: ADDITIONAL 12 NONCOMPLIANT STRs IN LAKE CATHERINE (CURRENT)



[12] Bret Bodin, et al. v. the City of New Orleans, 2025.

f. Of the total transient lodging uses in Lake Catherine (33), most are CSTRs (20; 61%), followed by Noncompliant STRs (12; 36%), and NSTRs (1, 3%). While these numbers are relatively low compared to other neighborhoods, it is clear that STRs are the prominent transient lodging use in the area.

5. Consistency with the City's Master Plan

Recommended updates to definitions, standards, and zoning districts in **Section 7** are consistent with the City's Master Plan, including balancing goals related to neighborhoods and housing, and enhancing prosperity and opportunity described in **Table 4** below.

TABLE 4. MASTER PLAN GOALS AND OBJECTIVES CONSISTENT WITH STUDY RECOMMENDATIONS.

MASTER PLAN CHAPTER	RELATED GOAL
Chapter 5: Neighborhoods and Housing: Neighborhoods Goals	• Enhance character and livability for all neighborhoods, with investments to improve quality of life. • Tailor policies and programs to maintain and enhance the physical, economic, social and cultural character and diversity of existing residential neighborhoods. • Establish systems to conduct code enforcement activities while providing low-income residents with resources that assist them to comply. • Develop a protocol for dealing with businesses that are incompatible with residences and with "nuisance businesses" while appropriately protecting due process. • Focus investment strategies to meet neighborhood needs and promote equity and access to opportunity. • Continue redevelopment of blighted and vacant sites through a comprehensive blight elimination program under unified management. Establish neighborhood plans that direct investment strategies in each neighborhood. In neighborhoods and areas with limited market activity, focus on catalytic investments and community-based programs that benefit existing residents and increase access to opportunity. • In neighborhoods and areas with increasing market activity, prevent displacement of existing residents by providing home rehabilitation resources, and creating new affordable homeownership and rental housing units. • In neighborhoods and areas with high levels of market activity and high home prices, preserve and expand affordable housing opportunities using all available tools.
Chapter 5: Neighborhoods and	• Reinvent housing policies to support quality neighborhoods, meet the diverse housing needs of all households, and support a range of rental and homeownership options for residents of all income levels.

MASTER PLAN CHAPTER	RELATED GOAL
Housing: Housing Goals	• Preserve existing supply and expand the total supply of affordable rental and homeownership opportunities throughout New Orleans. • Maintain and expand market-rate housing choices and housing supply. • Prevent future displacement through development activities and continued study and policy review. • Enforce and promote fair housing policies throughout New Orleans.
Chapter 9: Enhancing Prosperity and Opportunity	• Make New Orleans a safer, more reliable City in which to live, work and play. • Preservation and expansion of established industries. • Preserve and enhance the tourism industry. • Support the development of new entrepreneurial ventures. • Sustain and grow the City's small- and micro-business base. • Revitalize downtown New Orleans and Canal Street to transform downtown into a thriving, mixed-use urban center.

6. Conclusion

A simple solution (like an outright ban or a broad approval) will not resolve ongoing conflicting perspectives and land use conflicts amongst owner and non-owner cohorts—a compromise is needed.

1. Outright bans on Short Term Rentals have not proved to be a "silver bullet" that solves common issues associated with STRs, such as housing affordability. For example, New York City's outright ban on Short Term Rentals resulted in increased revenue for City hotels, and no increase in available affordable housing. Notably, the ban did slow the usual rate of rent increases, but decreased revenue in the boroughs outside of Manhattan, particularly of single- and two-family homes. The ban also ***increased*** illegal listings with limited oversight to manage issues.[13] When considering outright bans, it is important to keep in mind that New Orleans' real estate does not have the same demand as New York, and that property management and land use regulation are two very different operational systems reliant on a different suite of policy options.
2. Further, these systems serve different purposes (public vs. private), have different limitations (property rights vs. public welfare), and operate within different frameworks (business vs. government). When each system is respected and acknowledged for what it is (and is not), they can be managed to create opportunity and support improved quality of life and governmental effectiveness.
3. An extensive review of comparable City approaches (**Appendix A**) suggests that the City's history and relationship with transient lodging uses, specifically Short Term Rentals, is not novel; and interviews and outreach suggest it is a nuanced and complicated issue citywide, with

[13] Schaal, D. (2024, December 27). *Takeaways from NYC's Near-Ban on Airbnb*. Skift Global Forum. https://skift.com/2024/12/27/takeaways-from-nycs-near-ban-on-airbnb/

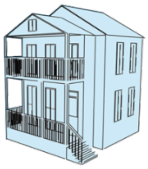
the most divergent perspectives emerging between CSTR Owner and Non-Owner Cohorts.[14] To resolve conflicting perspectives amongst owner and non-owner cohorts—a compromise is needed that involves a bottom up approach based on (1) streamlined and consistent definitions and use standards; (2) use permissions that reflect zoning district purposes ***as well as*** development patterns and community input; and (3) density limitations that serve an immediate goal to limit the over-concentration of CSTRs and Bed and Breakfasts (as a potential loophole).

7. Recommendations

Note: More detail provided in **Appendix C.*

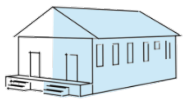
7.1 Comprehensive Updates to Transient Lodging Use Regulations

1. Establish an appropriate land use spectrum and scale to manage the variety of transient lodging land uses, including adopting mutually exclusive transient lodging terms (i.e., consistently comparing "apples to apples") to support consistent code interpretation, public and user understanding, and apply regulations in a fair and predictable manner across the City. Examples are shown below and throughout this section, where the blue shaded areas in each image depict the extent of the use category within the building:



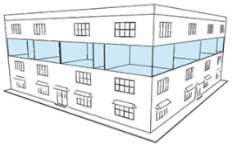
B&B

Bed and Breakfast



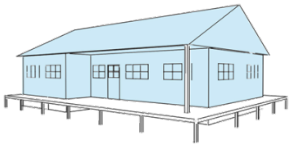
CSTR-S

Commercial Short Term Rental - Small



CSTR-M

Commercial Short Term Rental – Medium

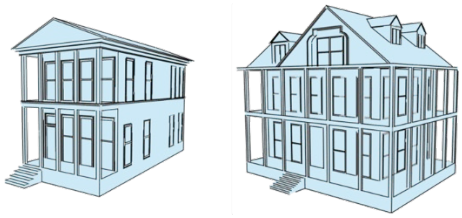


CSTR-L

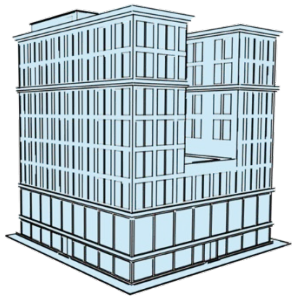
Commercial Short Term Rental – Large

2. Establish an appropriate land use spectrum and scale appropriate for commercial areas and 24/7 onsite operators. Examples are shown below and throughout this section, where the blue shaded areas in each image depict the extent of the use category within the building:

[14] When asked about CSTRs and existing housing stock, 77.27% of current or former CSTR owners stated that CSTRs help promote reinvestment in the housing stock, compared to only 20.80% of non-owners who agreed with this assertion. A similar pattern emerged around economic opportunity: 63.64% of CSTR owners said CSTRs provide business opportunities for locals that would not otherwise exist through other types of transient lodging, while just 18.07% of non-CSTR owners and renters agreed. Additionally, 70.45% of current or former CSTR owners stated that CSTRs help support and grow local businesses, compared to only 17.48% of non-owners.



Hotel/Motel
Neighborhood



Hotel/Motel
Large

3. Explain uses in more detail to help the reader understand (and imagine) the use as distinguished from other similar uses and include regulatory language in list form, consistent from one definition to another, to easily differentiate changes in requirements across all uses. Streamline and breakdown use categories and minimum standards based on density and impact on the surrounding environment. Specifically:

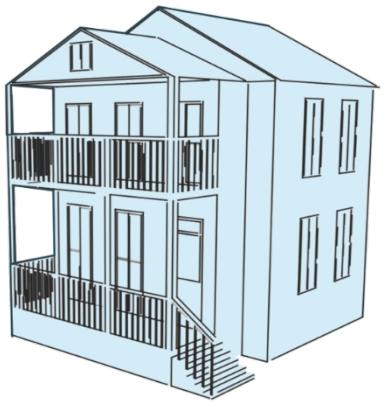
   a. Combine Bed and Breakfasts terms (principal and accessory) into one and limit bedrooms to 5 maximum, defined and regulated as follows:

      Bed and Breakfast. An operator-occupied single-family dwelling, or other structure that has been legally converted to a single-family dwelling, that provides sleeping rooms for overnight paid occupancy for up to thirty (30) nights. Bed and Breakfasts are characterized by: (1) overnight visitors renting a room within a home or residential dwelling; (2) in-room services; (3) shared common spaces; and (4) in person host-interactions upon arrival, throughout the guest's stay, and upon departure; and (5) a Bed and Breakfast can provide no more than five (5) guest bedrooms. Common bathroom facilities may be provided rather than private baths for each guest bedroom.

Minimum standards include:

- *Management:* Operator-occupied. Applicant must submit at least three (3) pieces of proof of residence to the Department of Safety and Permits.
- *Structure:* Single-family dwelling. There can be no appearance of a business use other than a permitted sign.
- *Sign*: One (1) sign is permitted per applicable zoning regulations.
- *Transient dwelling unit*: None.
- *Guestroom/sleeping accommodations:* Five (5) maximum.
- *Density:* One (1) per lot and block.
- *Additional clarifications and standards:*
    - *Bathrooms.* Common bathroom facilities may be provided rather than private baths for each guest bedroom.
    - *Block limitations.* A city block is a City-designated square, provided that where a square designation does not exist or cannot be identified, a block is defined as: (1) a portion of land enclosed by public rights-of-way, or (2) a portion of land enclosed by any combination of public rights-of-way, railroads, canals, bayous, rivers, and boundary lines of the City, whichever is smallest. The one (1) per lot and block rule applies across all Bed and Breakfasts and NSTRs on a block, where there can be no more than one (1) of these uses per block.
    - *In-room cooking facilities.* Cooking facilities are prohibited in individual guest rooms.
    - *Meal service.* If meals are provided, only registered guests may be served. If the zoning district allows restaurants and the facility meets all other applicable City and State codes for food service, meals may be served to guests other than those registered with the bed and breakfast.
    - *Event space.* Leasing of common areas for special events or receptions shall not be allowed on site, unless the zoning district allows reception facilities and the facility meets all applicable off-street parking requirements, noise ordinances, and all other provisions of the City Code.

FIGURE 37 – Example Bed & Breakfast within a Single-Family Dwelling.



b. Reaffirm CSTRs as small, private, unique temporary lodging spaces distinguished from bed and breakfasts and hotels/motels. Allow additional concentration of CSTR-Ms in CBD1-7, EC, MC, MS, and LS districts for tourism and economic development. Provide for a block measurement when a street grid is not readily apparent. CSTRs are to be defined and regulated as follows:

Short Term Rental, Commercial. An establishment providing dwelling units for overnight paid occupancy in accordance with this section where guest accommodations are designed to offer a unique, private, home-like, stay. Short Term Rental, Commercial is further defined as follows:

Short Term Rental, Commercial – Small (CSTR-S). One (1) unit located in a multi-unit dwelling having a maximum of two (2) guest bedrooms and four (4) occupants, OR one unit located in a Dwelling, Above the Ground Floor in a multi-story mixed-use building, wherein the unit has a maximum of two (2) guest bedrooms and four (4) occupants.

Minimum standards include:

- *Management:* A designated and permitted operator must be on call and available to address neighborhood complaints or guest questions twenty-four (24) hours a day, seven (7) days a week. Failure to respond to a call or neighborhood complaint within one (1) hour, over the course of three (3) occurrences within two (2) weeks, shall be a violation of the CSTR license and grounds for revocation.
- *Structure:* Traditional shotgun two-family or multi-family dwelling with a maximum of four (4)

FIGURE 38 – Example CSTR-S within a duplex.

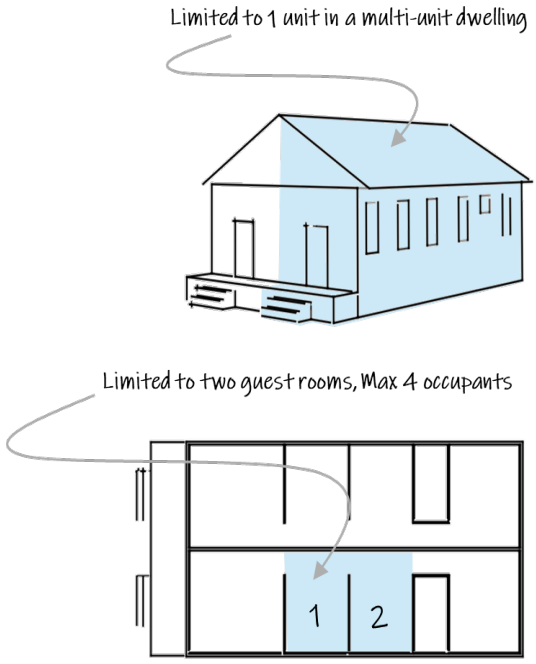
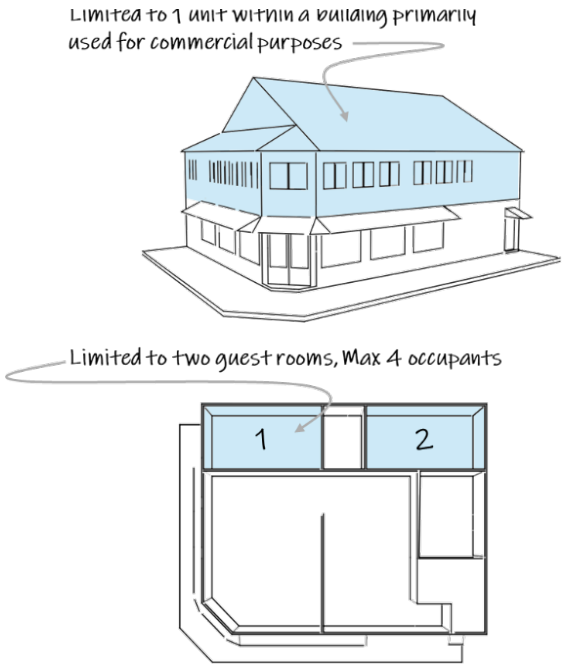


FIGURE 39 – Example CSTR-S within a mixed-use building.

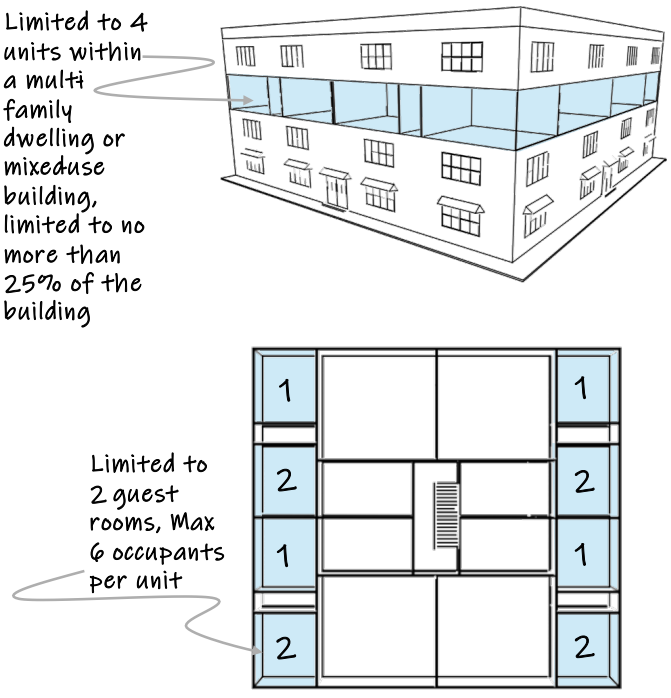


dwelling units OR Dwelling, Above the Ground Floor in a multi-story mixed-use building.

- *Transient dwelling unit:* One (1) maximum.
- *Guestroom/Sleeping accommodations:* Two (2) guest bedrooms and four (4) occupants maximum.
- *Density:* Limited to one (1) per building, lot, and block.
- *Additional clarifications and standards.*
  - *Prohibitions.* Whole home single family dwellings in use as a CSTR-S are prohibited.
  - *Block limitations.* A city block is a City-designated square, provided that where a square designation does not exist or cannot be identified, a block is defined as: (1) a portion of land enclosed by public rights-of-way, or (2) a portion of land enclosed by any combination of public rights-of-way, railroads, canals, bayous, rivers, and boundary lines of the City, whichever is smallest. The one (1) per lot and block rule applies across all CSTR-S, CSTR-M, and CSTR-Ls on a block, where there can be no more than one (1) of these uses per block. The one (1) per block limitation shall apply to the structure, not the license. If there is no clear street grid pattern in the applicable area, a block shall be measured at a length of three-hundred (300) linear feet.

Short Term Rental, Commercial – Medium (CSTR-M). Two (2) to four (4) units within a multi-family dwelling or mixed-use multi-story building, limited to no more than twenty-five percent (25%) of the building, with a maximum of two (2) guest bedrooms and six (6) occupants per unit. In the CBD-1, CBD-2, CBD-3, CBD-4, CBD-5, CBD-6, and CBD-7, EC, MC, MS, and LS zoning districts, no more than four (4) CSTR-Ms or ten (10) percent of the building, whichever is more, per building and lot. Minimum standards include:

FIGURE 40 – Example CSTR-M within a multi-family building.



- *Management:* A designated and permitted operator must be on call and available to address neighborhood complaints or guest questions twenty-four (24) hours a day, seven (7) days a week. Failure to respond to a call or neighborhood complaint within one (1) hour, over the course of three (3) occurrences within two (2) weeks, shall be a

violation of the CSTR license and grounds for revocation. All dwelling units used for guest stays as part of a CSTR-M permit must be managed as a single land use activity by the same entity.

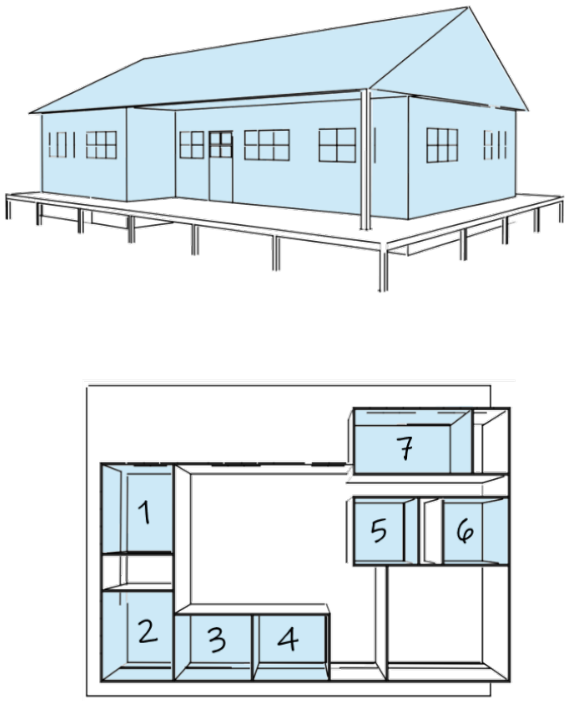
- *Structure:* Multi-family dwelling or mixed-use, multi-story building.
- *Transient dwelling unit:* Four (4) maximum per building or twenty-five (25) percent, whichever is less, or no more than four (4) CSTR-Ms or ten (10 percent of the building, whichever is more, in the CBD-1, CBD-2, CBD-3, CBD-4, CBD-5, CBD-6, CBD-7, EC, MC, MS, and LS zoning districts.
- *Guestroom/sleeping accommodations:* Maximum of two (2) guest bedrooms and six (6) occupants per unit.
- *Citywide density limitations:*
  - No more than four (4) CSTR-M or twenty-five (25) percent maximum, whichever is less, per building and lot.
  - No more than one (1) building with CSTR-Ms maximum per city block. If there is no clear street grid pattern in the applicable area, a block shall be measured at a length of three-hundred (300) linear feet.
  - CSTR-Ms may have up to four (4) permits in one building but must have the same licensed operator for all units.
- *Density limitations specific to the CBD-1, CBD-2, CBD-3, CBD-4, CBD-5, CBD-6, and CBD-7, EC, MC, MS, and LS zoning districts.*
  - No more than four (4) CSTR-Ms or ten (10) percent of the building, whichever is more, per building and lot.
  - No more than three (3) buildings with CSTR-Ms maximum per city block.
  - CSTR-M permits within the same building must have the same operator for all units.
- *Additional clarifications and standards.*
  - *Prohibitions.* Whole home, single-family dwellings in use as a CSTR-M are prohibited.
  - *Block limitations.* A city block is a City-designated square, provided that where a square designation does not exist or cannot be identified, a block is defined as: (1) a portion of land enclosed by public rights-of-way, or (2) a portion of land enclosed by any combination of public rights-of-way, railroads, canals, bayous, rivers, and boundary lines of the City, whichever is smallest. Density limits apply across all CSTR-S, CSTR-M, and CSTR-Ls on a block, where there can be no more than one (1) or three (3) of these uses per block in accordance with this section. If there is no clear street grid pattern in the applicable area, a block shall be measured at a length of 300 linear feet. The one (1) per block and three (3) per block limitation shall apply to the structure, not the license.

Short Term Rental, Commercial – Large (CSTR-L). A whole home single family dwelling with up to seven (7) guest bedrooms and no more than twenty (20) occupants maximum.

Minimum standards include:

- *Management:* A designated and permitted operator must be on call and available to address neighborhood complaints or guest questions twenty-four (24) hours a day, seven (7) days a week. Failure to respond to a call or neighborhood complaint within one (1) hour, over the course of three (3) occurrences within two (2) weeks, shall be a violation of the CSTR license and grounds for revocation.
- *Structure:* Whole home single-family dwelling.
- *Transient dwelling unit:* One (1) maximum.
- *GuestroomsSleeping accommodations:* Seven (7) bedrooms and twenty (20) occupants per unit maximum.

FIGURE 41 – Example CSTR-L within a whole home single-family structure.



- Extended stay: 30 day maximum.
- *Density.* Limited to one (1) per building, lot, and block.
- *Additional clarifications and standards.*
  - *Block limitations.* A city block is a City-designated square, provided that where a square designation does not exist or cannot be identified, a block is defined as: (1) a portion of land enclosed by public rights-of-way, or (2) a portion of land enclosed by any combination of public rights-of-way, railroads, canals, bayous, rivers, and boundary lines of the City, whichever is smallest. The one (1) per lot and block rule applies across all CSTR-S, CSTR-M, and CSTR-Ls on a block, where there can be no more than one (1) of these uses per block. If there is no clear street grid pattern in the applicable area, a block shall be measured at a length of three-hundred (300) linear feet. The one (1) per block limitation shall apply to the structure, not the license.

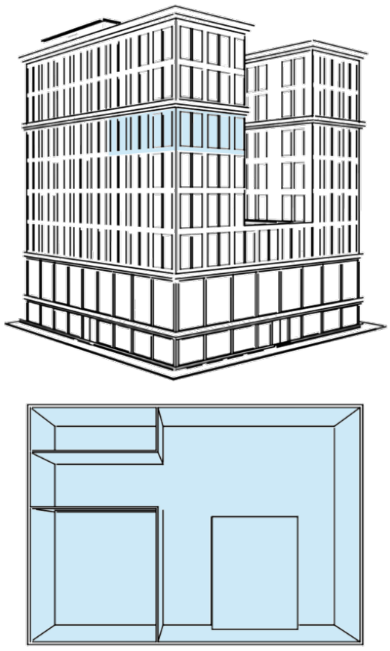
c. Add a definition for "Timeshare Dwelling Unit," in addition to Timeshare Building, to read as follows:

Timeshare Building. A building containing condominium units, rooms or suites of rooms, with or without culinary facilities and subject to a timeshare plan. The

construction of or conversion to timeshare buildings must be registered with the Department of Safety and Permits by applying for a Certificate of Use and Occupancy.

Timeshare Dwelling Unit. A condominium unit, room or suite of rooms within a Timeshare Building. Generally, Timeshares are characterized by shared ownership where multiple owners occupy the unit at different parts of the year. Timeshare Dwelling Units may not be used as a Short Term Rental, Commercial.

FIGURE 42 – Example Timeshare Dwelling Unit in a Condominium Building.



d. Reclassify existing large, multi-unit, multi-storied transient lodging uses as Hotels and Motels to (1) better address the variety of land use impacts and densities, (2) allow for a more thoughtful approach to permitting Hotels and Motels across the City's existing zoning districts, and (3) capture larger Bed and Breakfast and CSTR operations exceeding 5 guestrooms and 4 dwelling units, where requiring an on-site operator to ensure adequate site management is appropriate. Provide direction on ancillary uses and conditional use permits in the use standards, where:

Hotel/Motel, General. An establishment providing a private room for sleeping accommodations for a fee with private bathroom facilities and customary lodging services for up to thirty (30) nights. Hotels shall be permitted to include units for sale designed or used exclusively for permanent residential use in all districts except in Light Industrial (LI), Heavy Industrial (HI), and Business Industrial Park (BIP) districts. Prior to the issuance of a Certificate of Occupancy and/or Occupational License the hotel or motel shall be in compliance with all federal, state, and local laws and commercial transient lodging building codes. Hotel/Motel land use classifications are further defined as follows:

Regulations: All hotels and motels shall comply with the regulations of the Department of Safety and Permits, the Department of Finance, Bureau of Revenue, the State Fire Marshal, and the adopted state uniform construction code prior to obtaining a certificate of occupancy in accordance with the City of New Orleans Code of Ordinances and this CZO.

Customary lodging services: Customary lodging services should have a restroom available for staff at all hours.

Hotel/motel land use classifications and specific standards. The following Hotel/Motel land use classifications and standards shall apply in accordance with definitions in Article 26 – Definitions of this CZO.

Hotel/Motel, Neighborhood. An establishment having no more than twenty (20) units [limited to no more than two (2) guest bedrooms per unit] with private bathroom facilities. The establishment shall be a neighborhood-oriented single-family dwelling or traditional hotel structure, such as multi-storied buildings with a lobby and elevator. "Neighborhood-oriented" specifically refers to a site design that takes into account neighboring structures and features and emphasizes the essential character of a neighborhood. For example, the site design must (1) match the predominant neighborhood building scale and historic or contributing architectural features, (2) mitigate potential negative impacts through

FIGURE 43 – Example Neighborhood Hotel, limited to 20 units.

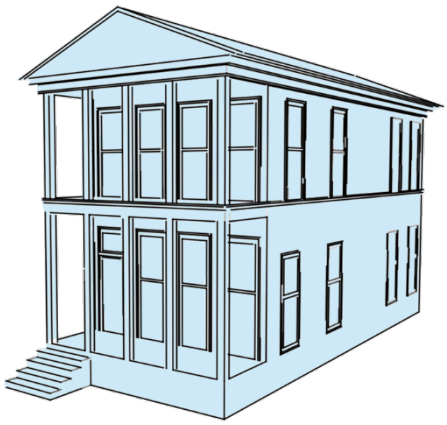


FIGURE 44 – Example Neighborhood Hotel, limited to 20 units.



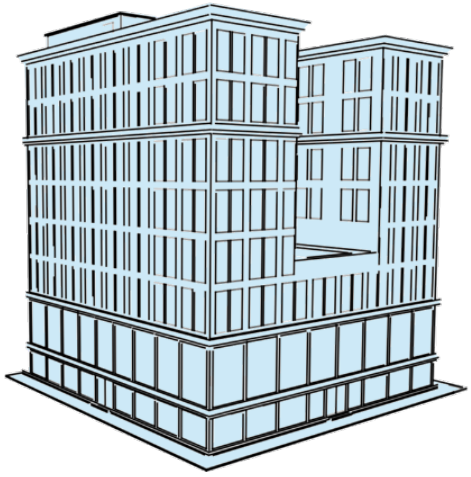
landscape and hardscape features that provide screening, and (3) orient parking features and elements away from existing residential dwellings.

Minimum standards include:

- *Management:* Must have customary lodging services.
- *Structure:* Single-family dwelling or traditional hotel structure, such as a multi-storied building with a lobby and elevator.
- *Transient dwelling unit:* Twenty (20) maximum.
- *Guestroom/sleeping accommodations:* No limit.
- *Additional clarifications and standards.*
    - *Ancillary uses.* May include hotel ancillary uses in accordance with the base zoning district.

Hotel/Motel, Large. An establishment having twenty-one (21) or more units with private bathroom facilities. This hotel type includes larger hotels having more than two (2) guest rooms per unit, such as multi-storied buildings with a lobby or elevator owned by a franchise. Related ancillary uses may include, but are not limited to conference and meeting rooms, restaurants, sale of convenience items, bars, and recreational facilities.

FIGURE 45 – Example Large Hotel, over 20 units.



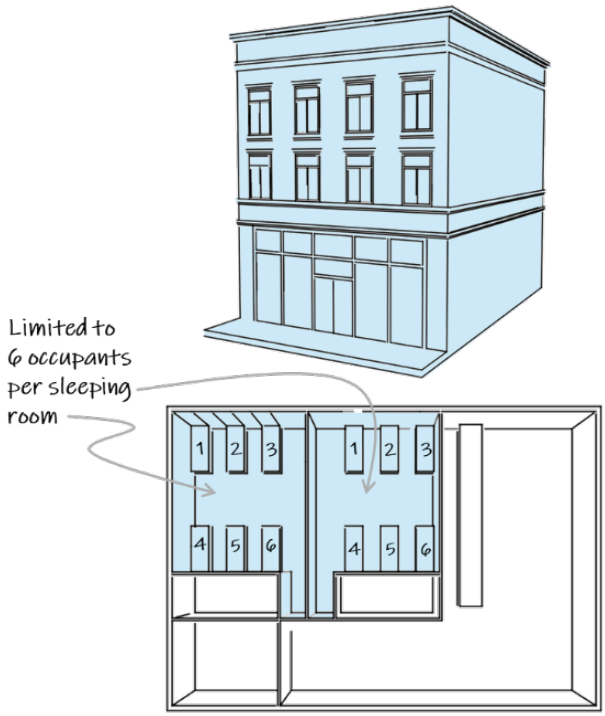
Minimum standards include:

- *Management:* Must have customary lodging services.
- *Structure:* Large hotel structure.
- *Transient dwelling unit:* Twenty-one (21) or more.
- *Guestroom/sleeping accommodations*: None.
- *Additional clarifications and standards.*
    - *Ancillary uses.* May include hotel ancillary uses. Related ancillary uses may include, but are not limited to conference and meeting rooms, restaurants, sale of convenience items, bars, and recreational facilities. These ancillary uses are inherent uses allowed by right in Hotel/Motel, Large.

e. Add clarifying minimum standards for Hostels consistent with other transient lodging uses, to read as follows:

> **Hostel.** An establishment providing sleeping accommodations for a fee in a sociable accommodation where guests can rent a bed in a dormitory and share bathroom, lounge, and kitchen facilities for up to thirty (30) nights.
>
> Minimum standards include:
> - *Management:* Must have an on-site operator twenty-four (24) hours a day, seven (7) days a week.
> - *Structure:* Must be located in a building designed for hostel accommodations.
> - *Transient dwelling unit*: None.
> - *Guestroom/sleeping accommodations:* Sleeping accommodations must be limited to two (2) occupants unless the room contains seventy (70) square feet of floor area per occupant or bed. No more than six (6) occupants per sleeping room.
> - *Additional clarifications and standards:* Common bathroom facilities may be provided rather than private baths for each guest bedroom.

FIGURE 46 – Example Hostel.



4. Update transient lodging use permissions to reflect each zoning district's intended purpose, as well as development patterns and community input. Manage the density of B&Bs, NSTRs, and CSTRS to protect community character. Where:

   a. Updates to **Bed and Breakfast** regulations clarify what a Bed and Breakfast is, keep it small and in residential areas, update Bed and Breakfast use permissions from conditional use to by right, remove Bed and Breakfasts from non-residential districts where they are currently permitted, and reclassify larger Bed and Breakfasts as Hotels and Motels where they are more aligned with size and accommodations.

   Bed and Breakfast uses are recommended to be:

   - *Permitted by right in*: Maritime Mixed-Use District (M-MU), Historic Marigny/Tremé Bywater Residential District (HMR-1), Historic Marigny/Tremé/Bywater Residential

District (HMR-2), Historic Marigny/Tremé/Bywater Residential District (HMR-3), Vieux Carré Entertainment District (VCE), Single-Family Residential District (HU-RS), Two-Family Residential District (HU-RD1), Two-Family Residential District (HU-RD2), Multi-Family Residential District (HU-RM1), Multi-Family Residential District (HU-RM2), Single-Family Residential District (S-RS), Two-Family Residential District (S-RD), Multi-Family Residential District (SRM-1), Multi-Family Residential District (S-RM2), Lakeview Single-Family Residential District (S-LRS1), Lake Vista and Lake Shore Single-Family Residential District (S-LRS2), Lakewood and Country Club Gardens Single-Family Residential District (S-LRS3), Lake Vista Two-Family Residential District (S-LRD1), Lakewood/Parkview Two-Family Residential District (S-LRD2), Lake Area Low-Rise Multi-Family Residential District (S-LRM1), Lake Area High-Rise Multi-Family Residential District (S-LRM2), Educational Campus District (EC), Medical Campus District (MC), Medical Service District (MS), Life Science Mixed-Use District (LS)

- *Permitted by Conditional Use*: N/A

b. New CSTR terminology allows for small and medium CSTRs to continue to operate in appropriate locations at lower densities, while more substantial CSTRs (having more than 4 units or 25% of a building) are reclassified as either Bed and Breakfasts (up to 5 guest bedrooms) or Hotels and Motels and limited to more intense zoning districts. Where:

CSTR-S uses are recommended to be:

- *Permitted by right in*: Maritime Mixed-Use District (M-MU), Vieux Carré Entertainment District (VCE), Vieux Carré Entertainment District (VCE-1), Pedestrian-Oriented Corridor Business District (S-B2), Lake Area Neighborhood Business District (S-LB1), Lake Area Neighborhood Business District (S-LB2), Suburban Neighborhood Mixed-Use District (S-MU), Lake Area Marina District (S-LM), General Commercial District (C-1), Auto-Oriented Commercial District (C-2), Heavy Commercial District (C-3), Medium Intensity Mixed-Use District (MU-1), High Intensity Mixed-Use District (MU-2), Educational Campus District (EC), Medical Campus District (MC), Medical Service District (MS), Life Science Mixed-Use District (LS), Core Central Business District (CBD-1), Historic Commercial and Mixed-Use District (CBD-2), Cultural Arts District (CBD-3), Exposition District (CBD-4), Urban Core Neighborhood Lower-Intensity Mixed-Use District (CBD-5), Urban Core Neighborhood Mixed-Use District (CBD-6), Bio-Science District (CBD-7)
- *Permitted by Conditional Use:* N/A

CSTR-M uses are recommended to be:

- *Permitted by right in:* Maritime Mixed-Use District (M-MU), Vieux Carré Entertainment District (VCE), Vieux Carré Entertainment District (VCE-1), Lake Area General Commercial District (S-LC), Lake Area Marina District (S-LM), General Commercial District (C-1), Auto-Oriented Commercial District (C-2), Heavy Commercial District (C-3), Medium Intensity Mixed-Use District (MU-1), High Intensity Mixed-Use District (MU-2), Educational Campus District (EC), Medical Campus District (MC), Medical Service District (MS), Life Science Mixed-Use District (LS), Light Industrial District (LI), Heavy Industrial District (HI), Maritime Industrial District (MI), Business-Industrial Park District (BIP), Core Central Business District (CBD-1), Historic Commercial and Mixed-Use District (CBD-2), Cultural Arts District (CBD-3), Exposition District (CBD-

4), Urban Core Neighborhood Lower-Intensity Mixed-Use District (CBD-5), Urban Core Neighborhood Mixed-Use District (CBD-6), Bio-Science District (CBD-7)

- *Permitted by Conditional Use:* N/A

CSTR-L uses are recommended to be:

- *Permitted by right in:* Maritime Mixed-Use District (M-MU), Lake Area Marina District (S-LM), Auto-Oriented Commercial District (C-2), Heavy Commercial District (C-3), Medical Campus District (MC), Medical Service District (MS), Life Science Mixed-Use District (LS), Light Industrial District (LI), Heavy Industrial District (HI), Maritime Industrial District (MI), Business-Industrial Park District (BIP), Core Central Business District (CBD-1), Historic Commercial and Mixed-Use District (CBD-2), Cultural Arts District (CBD-3), Exposition District (CBD-4), Urban Core Neighborhood Mixed-Use District (CBD-6), Bio-Science District (CBD-7)
- *Permitted by Conditional Use:* General Planned Development District (GPD)

Hotel/Motel, Neighborhood uses are recommended to be:

- *Permitted by right in:* Vieux Carré Entertainment District (VCE-1), Lake Area Neighborhood Business District (S-LB1), Lake Area Neighborhood Business District (S-LB-2), Lake Area General Commercial District (S-LC), Suburban Neighborhood Mixed-Use District (S-MU), Lake Area Marina District (S-LM), General Commercial District (C-1), Auto-Oriented Commercial District (C-2), Heavy Commercial District (C-3), Educational Campus District (EC), Medical Campus District (MC), Medical Service District (MS), Life Science District (LS), Light Industrial District (LI), Heavy Industrial District (HI), Maritime Industrial District (MI), Business-Industrial Park District (BIP), Core Central Business District (CBD-1), Historic Commercial and Mixed-Use District (CBD-2), Cultural Arts District (CBD-3), Exposition District (CBD-4), Urban Core Neighborhood Lower-Intensity Mixed-Use District (CBD-5), Urban Core Neighborhood Mixed-Use District (CBD-6), Bio-Science District (CBD-7).
- *Permitted by Conditional Use:* General Planned Development District (GPD), Neighborhood Business District (HU-B1A), Neighborhood Business District (HU-B1), Neighborhood Mixed-Use District (HU-MU), Medium Intensity Mixed-Use District (MU-1), High Intensity Mixed-Use District (MU-2)

Hotel/Motel, Large uses are recommended to be:

- *Permitted by right in:* Auto-Oriented Commercial District (C-2), Heavy Commercial District (C-3), Medical Service District (MS), Medical Campus District (MC), Life Science District (LS), Light Industrial District (LI), Heavy Industrial District (HI), Maritime Industrial District (MI), Business-Industrial Park District (BIP), Core Central Business District (CBD-1), Historic Commercial and Mixed-Use District (CBD-2), Cultural Arts District (CBD-3), Exposition District (CBD-4), Urban Core Neighborhood Lower-Intensity Mixed-Use District (CBD-5), Urban Core Neighborhood Mixed-Use District (CBD-6), Bio-Science District (CBD-7)
- *Permitted by Conditional Use:* General Planned Development District (GPD), Medium Intensity Mixed-Use District (MU-1), High Intensity Mixed-Use District (MU-2)

c. There is no change to **Hostel or Timeshare** terms or existing use permissions. Minimum standards are clarified to create consistency with other transient lodging uses, where:

Hostel uses are:

- *Permitted by right in:* Historic Marigny/Tremé/Bywater Commercial District (HMC-2), General Commercial District (C-1), Auto-Oriented Commercial District (C-2), Heavy Commercial District (C-3), Medium Intensity Mixed-Use District (MU-1), High Intensity Mixed-Use District (MU-2), Educational Campus District (EC), Medical Campus District (MC), Medical Service District (MS), Life Science Mixed-Use District (LS), Business-Industrial Park District (BIP), Core Central Business District (CBD-1), Historic Commercial and Mixed-Use District (CBD-2), Cultural Arts District (CBD-3), Exposition District (CBD-4), Bio-Science District (CBD-7)
- *Permitted by Conditional Use:* Lake Area General Commercial District (S-LC)

Timeshare uses are:

- *Permitted by right in*: Lake Area General Commercial District (S-LC), Business-Industrial Park District (BIP), Core Central Business District (CBD-1), Historic Commercial and Mixed-Use District (CBD-2), Cultural Arts District (CBD-3), Exposition District (CBD-4), Bio-Science District (CBD-7)
- *Permitted by Conditional Use*: Auto-Oriented Commercial District (C-2), Medium Intensity Mixed-Use District (MU-1), Medical Campus District (MC), Medical Service District (MS), Life Science Mixed-Use District (LS), Urban Core Neighborhood Lower Intensity Mixed-Use District (CBD-5)

d. Comprehensive recommendations across all proposed transient lodging use categories are summarized in **Table 5** on the following page to provide both broad and neighborhood-specific land use regulations based upon the City's land use history, study background, data analysis, and community and stakeholder engagement —which reflect zoning district purposes as well as development patterns and community input—including references to existing standards (red and struck-through), where:

- In general, recommendations were made based on the purpose and function of a zoning district. Residential uses like Bed and Breakfasts are targeted to residential areas, commercial uses like CSTRs are targeted to mixed use and commercial areas, and hotels are targeted to commercial and industrial areas.
- In lower impact neighborhoods, the purpose and function of the zoning district led the proposed district recommendations.
- Removing Bed and Breakfasts from non-residential districts they are currently permitted.
- Changing Bed and Breakfast allowances from conditional use to by right.
- Retaining hostels and timeshares in the same zoning districts as currently permitted.
- Targeting mixed-use areas for small, neighborhood boutique hotels.

- Prohibiting and restricting transient lodging use expansion in higher impact neighborhoods identified by survey respondents, including the Bywater, Marigny and Seventh Ward.
- Allowing transient lodging uses in CBD, despite the area being identified as a higher impact neighborhood by survey respondents, based on the stakeholder interviewees and citywide land use analysis.
- Neighborhood Hotels are permitted by Conditional Use in the Medium Intensity Mixed-Use District (MU-1), High Intensity Mixed-Use District (MU-2).
- Large Hotels are permitted by conditional use in the MU-2, due to close proximity to residential districts, and the Medical Campus District (MC), Life Science District (LS).

TABLE 5: ZONING DISTRICT RECOMMENDATIONS

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE (CZO)	SUB-DISTRICT	TRANSIENT LODGING USE TYPES											
		BED AND BREAKFAST	~~BED AND BREAKFAST, ACCESSORY~~	~~BED AND BREAKFAST, PRINCIPAL~~	HOSTEL	~~HOTEL/MOTEL~~	HOTEL/MOTEL, NEIGHBORHOOD	HOTEL/MOTEL, LARGE	~~SHORT TERM RENTAL, COMMERCIAL~~	SHORT TERM RENTAL, COMMERCIAL – SMALL	SHORT TERM RENTAL, COMMERCIAL – MEDIUM	SHORT TERM RENTAL, COMMERCIAL – LARGE	TIMESHARE
Article 7: Open Space Districts	OS-N												
	OS-G												
	OS-R												
	NA												
	GPD					~~C~~	C	C	~~C~~			C	
	OS-CBD												
	OS-AR												
Article 8: Rural Development Districts	R-RE		~~C~~										
	M-MU	P	~~C~~	~~C~~					~~P~~	P	P	P	
Article 9: Historic Core Neighborhoods Residential Districts	VCR-1												
	VCR-2												
	HMR-1	P	~~C~~	~~C~~									
	HMR-2	P	~~C~~	~~C~~									

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE (CZO)	SUB-DISTRICT	TRANSIENT LODGING USE TYPES											
		BED AND BREAKFAST	~~BED AND BREAKFAST, ACCESSORY~~	~~BED AND BREAKFAST, PRINCIPAL~~	HOSTEL	~~HOTEL/MOTEL~~	HOTEL/MOTEL, NEIGHBORHOOD	HOTEL/MOTEL, LARGE	~~SHORT TERM RENTAL, COMMERCIAL~~	SHORT TERM RENTAL, COMMERCIAL – SMALL	SHORT TERM RENTAL, COMMERCIAL – MEDIUM	SHORT TERM RENTAL, COMMERCIAL – LARGE	TIMESHARE
	HMR-3	P	~~C~~	~~C~~									
Article 10: Historic Core Neighborhoods Non-Residential Districts	VCC-1												
	VCC-2												
	VCE	P	~~C~~	~~C~~					~~P~~	P	P		
	VCE-1						P			P	P		
	VCS												
	VCS-1												
	VCP												
	HMC-1		~~C~~	~~C~~					~~C~~				
	HMC-2		~~C~~	~~C~~	P	~~P~~			~~P~~				
	HM-MU		~~C~~	~~C~~		~~C~~			~~P~~				
Article 11: Historic Urban Neighborhoods Residential Districts	HU-RS	P	~~C~~										
	HU-RD1	P	~~C~~										
	HU-RD2	P	~~C~~										
	HU-RM1	P	~~C~~	~~C~~									
	HU-RM2	P	~~C~~	~~C~~									
Article 12: Historic Urban Neighborhoods Non-Residential Districts	HU-B1A		~~C~~	~~C~~			C						
	HU-B1		~~C~~	~~C~~			C						
	HU-MU		~~C~~	~~C~~		~~C~~	C		~~P~~				
Article 13: Suburban Neighborhoods Residential Districts	S-RS	P	~~C~~										
	S-RD	P	~~C~~										
	S-RM1	P	~~C~~										
	S-RM2	P	~~C~~										

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE (CZO)	SUB-DISTRICT	TRANSIENT LODGING USE TYPES											
		BED AND BREAKFAST	~~BED AND BREAKFAST, ACCESSORY~~	~~BED AND BREAKFAST, PRINCIPAL~~	HOSTEL	~~HOTEL/MOTEL~~	HOTEL/MOTEL, NEIGHBORHOOD	HOTEL/MOTEL, LARGE	~~SHORT TERM RENTAL, COMMERCIAL~~	SHORT TERM RENTAL, COMMERCIAL – SMALL	SHORT TERM RENTAL, COMMERCIAL – MEDIUM	SHORT TERM RENTAL, COMMERCIAL – LARGE	TIMESHARE
	S-LRS1	P	~~C~~										
	S-LRS2	P											
	S-LRS3	P											
	S-LRD1	P											
	S-LRD2	P	~~C~~										
	S-LRM1	P	~~C~~										
	S-LRM2	P	~~C~~										
Article 14: Suburban Neighborhoods Non-Residential Districts	S-B1[5]												
	S-B2[6]								~~P~~	P			
	S-LB1[5&7]		~~C~~	~~C~~			P			P			
	S-LB2[5&8]		~~C~~	~~C~~			P		~~P~~	P			
	S-LC[9]		~~C~~	~~C~~	C	~~C~~	P		~~P~~		P		P
	S-MU		~~C~~				P		~~P~~	P			
	S-LP												
	S-LM					~~C~~	P		~~P~~	P	P	P	
Article 15: Commercial Center & Institutional Campus Districts	C-1				P	~~P~~	P		~~P~~	P	P		
	C-2				P	~~P~~	P	P	~~P~~	P	P	P	C
	C-3				P	~~P~~	P	P	~~P~~	P	P	P	
	MU-1		~~C~~	~~C~~	P	~~P~~	C	C	~~P~~	P	P		C
	MU-2		~~C~~	~~C~~	P	~~P~~	C	C	~~P~~	P	P		
	EC[3]	P	~~C~~		P	~~P~~	P		~~P~~	P	P		
	MC	P			P	~~P~~	P	P	~~P~~	P	P	P	C
	MS	P			P	~~P~~	P	P	~~P~~	P	P	P	C

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE (CZO)	SUB-DISTRICT	TRANSIENT LODGING USE TYPES											
		BED AND BREAKFAST	~~BED AND BREAKFAST, ACCESSORY~~	~~BED AND BREAKFAST, PRINCIPAL~~	HOSTEL	~~HOTEL/MOTEL~~	HOTEL/MOTEL, NEIGHBORHOOD	HOTEL/MOTEL, LARGE	~~SHORT TERM RENTAL, COMMERCIAL~~	SHORT TERM RENTAL, COMMERCIAL – SMALL	SHORT TERM RENTAL, COMMERCIAL – MEDIUM	SHORT TERM RENTAL, COMMERCIAL – LARGE	TIMESHARE
	LS	P			P	~~P~~	P	P	~~P~~	P	P	P	C
Article 16: Centers for Industry	LI					~~P~~	P	P	~~P~~		P	P	
	HI					~~C~~	P	P	~~C~~		P	P	
	MI[2]					~~P~~	P	P	~~C~~		P	P	
	BIP				P	~~P~~	P	P	~~P~~		P	P	P
Article 17: Central Business Districts	CBD-1		~~C~~	~~C~~	P	~~P~~	P	P	~~P~~	P	P	P	P
	CBD-2		~~C~~	~~C~~	P	~~P~~	P	P	~~P~~	P	P	P	P
	CBD-3		~~C~~	~~C~~	P	~~P~~	P	P	~~P~~	P	P	P	P
	CBD-4				P	~~P~~	P	P	~~P~~	P	P	P	P
	CBD-5		~~C~~	~~C~~		~~C~~	P	P	~~P~~	P	P		C
	CBD-6		~~C~~	~~C~~		~~P~~	P	P	~~P~~	P	P	P	
	CBD-7				P	~~P~~	P	P	~~P~~	P	P	P	P

Implementing the above recommendations will help to streamline the permitting and enforcement process for CSTRs, reduce impacts on neighborhoods, and continue to allow limited economic development in areas without existing high concentrations of transient lodging uses.

7.2 Neighborhood Analysis: Recommendations' Effect.

1. *High Impact Neighborhood Analysis*. As discussed in section 4 of this report, this section examines the impact of proposed recommendations in select neighborhoods in each typology (high, moderate, and lower).

a. *High impact neighborhood example: Bywater.*

b. *Prohibited uses*. When applying proposed use permissions in the Bywater neighborhood, all of the transient lodging uses are permitted in some districts, either conditionally or by right.

c. *Bed and Breakfast.* Bed and Breakfasts are permitted by right in those blocks / zoning districts shaded in light green, including the Historic Marigny/Tremé/Bywater Residential District (HMR-1 and HMR-3), Two-Family Residential District (HU-RD2), and Multi-Family Residential District (HU-RM1). Only 45 blocks can be developed with a new Bed and Breakfast due to the density limit of only one B&B and NSTR per block. These available blocks are located throughout the Bywater neighborhood. See **Figure 48**.

d. *Hostel*. Hostels are permitted by right in the Bywater neighborhood in the districts shaded in light green. There is no change to the proposed district availability, due to the lack of feedback on hostels as a transient lodging use. These districts include the Historic Marigny/Tremé/Bywater Commercial District (HMC-2), Auto-Oriented Commercial District (C-2), Medium Intensity Mixed-Use District (MU-1), and High Intensity Mixed-Use District (MU-2) and are located along Chartres Street, St. Claude Avenue, and the Industrial Canal. See **Figure 49**.

e. *CSTR-S (Small).* CSTR-Ss are permitted by right in those blocks / zoning districts shaded in light green, including the Auto-Oriented Commercial District (C-2), Medium Intensity Mixed-Use District (MU-1), and High Intensity Mixed-Use District (MU-2). Only 9 blocks can be developed with a new CSTR-S (dark green) due to the density limit of only one CSTR-S, CSTR-M, and CSTR-L per block. These available blocks are only located along the Industrial Canal. See **Figure 50**.

f. *CSTR-M (Medium)*. CSTR-Ms are permitted by right in those blocks / zoning districts shaded in light green, including the Auto-Oriented Commercial District (C-2), High Intensity Mixed-Use District (MU-2), Light Industrial District (LI), Heavy Industrial District (HI), and Maritime Industrial District (MI). However, there are only some blocks that have potential for new CSTR-Ms by right (29, dark green) due to the limitation imposed of only one CSTR-S, CSTR-M, and CSTR-L on a block. These blocks are only located along the Mississippi River and the Industrial Canal. It is important to note that the CSTR-M limitation is no more than 4 units, or 25% per building, whichever is less. See **Figure 51.**

g. *CSTR-L.* CSTR-Ls are allowed by right in the Auto-Oriented Commercial District (C-2) and are only located near the Industrial Canal. However, there are a few blocks that have a potential for new CSTR-Ls (23, dark green) due to the limitation imposed of only one CSTR-S, CSTR-M, and CSTR-L on a block. See **Figure 52.**

h. *Neighborhood Hotel / Motel.* Neighborhood Hotels / Motels are allowed by right in those districts shaded in green, including the Auto-Oriented Commercial District (C-2), Light Industrial District (LI), Heavy Industrial District (HI), and Maritime Industrial District (MI). Neighborhood Hotels / Motels are conditionally permitted in those districts shaded in yellow, including the Medium Intensity Mixed-Use District (MU-1) and the High Intensity

Mixed-Use District (MU-2). These districts are located along the Mississippi River and the Industrial Canal. See **Figure 53**.

i. *Large Hotel.* Large Hotels are allowed by right in those districts shaded in green, including the Light Industrial District (LI), Heavy Industrial District (HI), and Maritime Industrial District (MI). These districts are only located along the Mississippi River and the Industrial Canal. See **Figure 54**.

j. *Timeshare*. Timeshares are conditionally permitted in the districts shaded in yellow, including the Auto-Oriented Commercial District (C-2) and Medium Intensity Mixed-Use District (MU-1) and are only located near the Industrial Canal. There is no change to the proposed district availability, due to the lack of feedback on Timeshares as a transient lodging use. See **Figure 55.**

All of these recommendations are shown spatially on the following pages in ***Figures 47-55****.*

FIGURE 47: BYWATER IMPACTED ZONING DISTRICTS

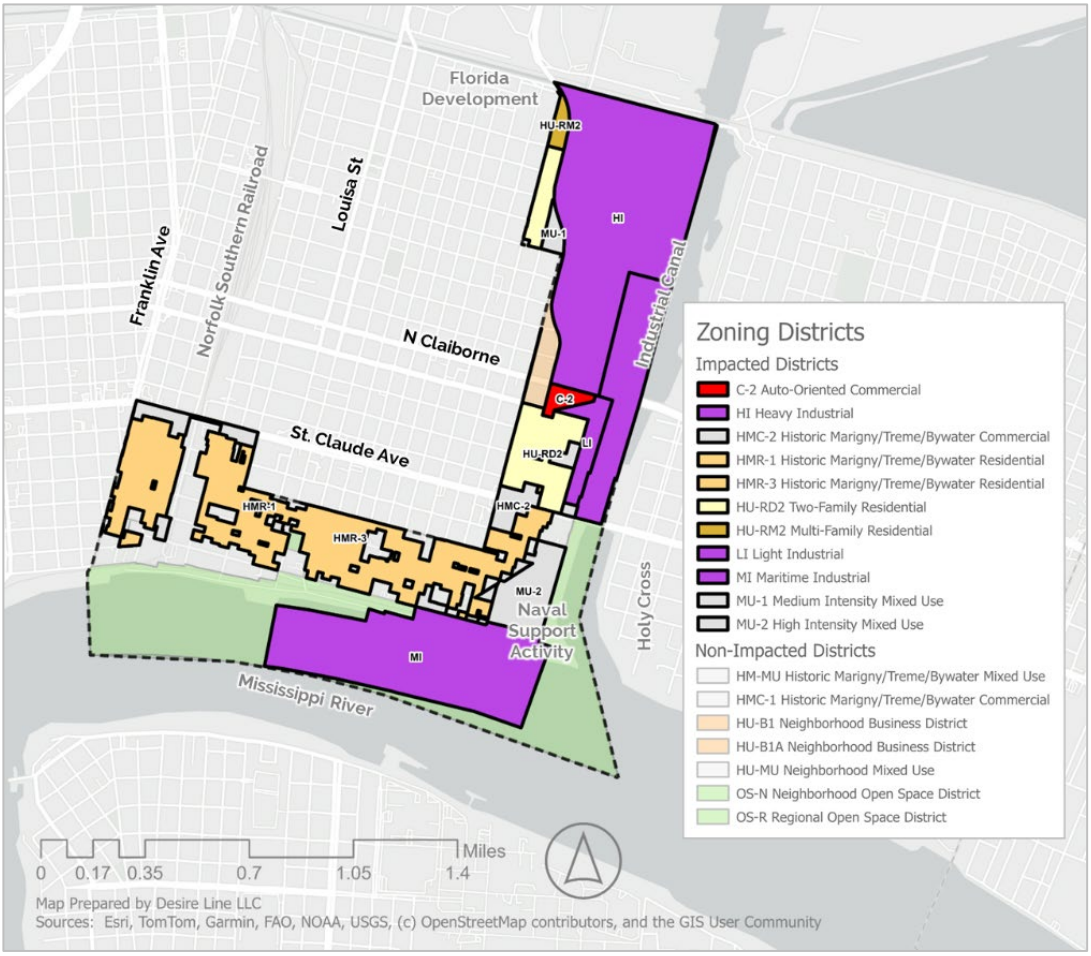




FIGURE 48: BYWATER USE PERMISSIONS: BED AND BREAKFASTS BY RIGHT

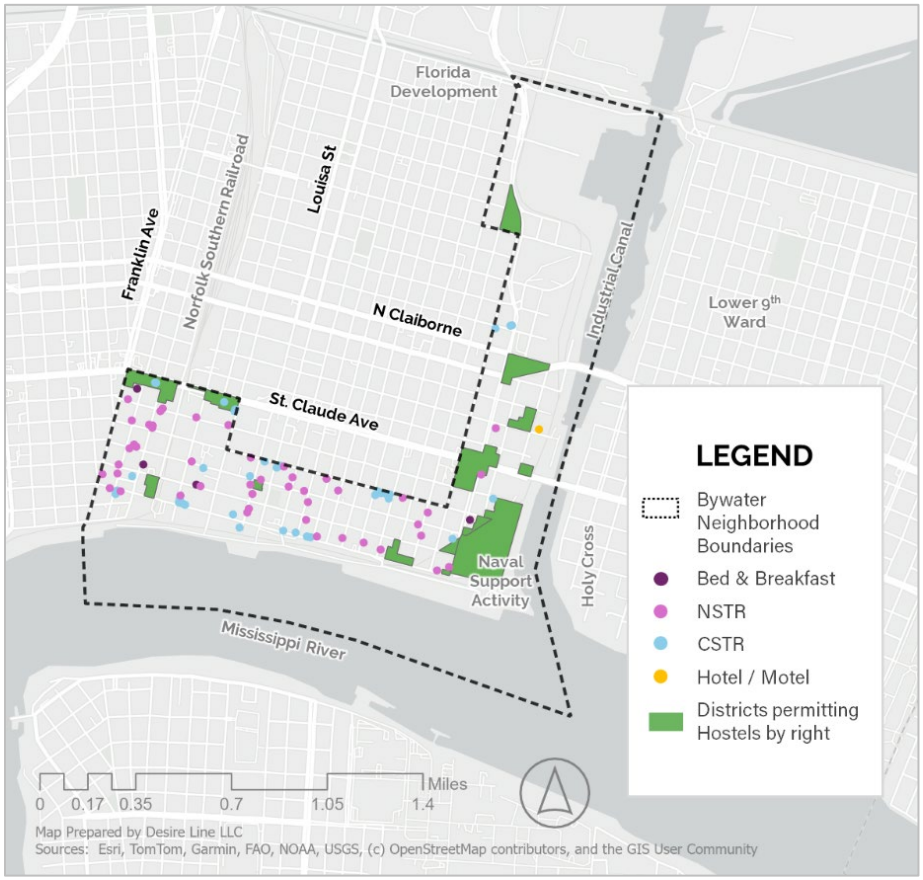


FIGURE 49: BYWATER USE PERMISSIONS: HOSTELS BY RIGHT

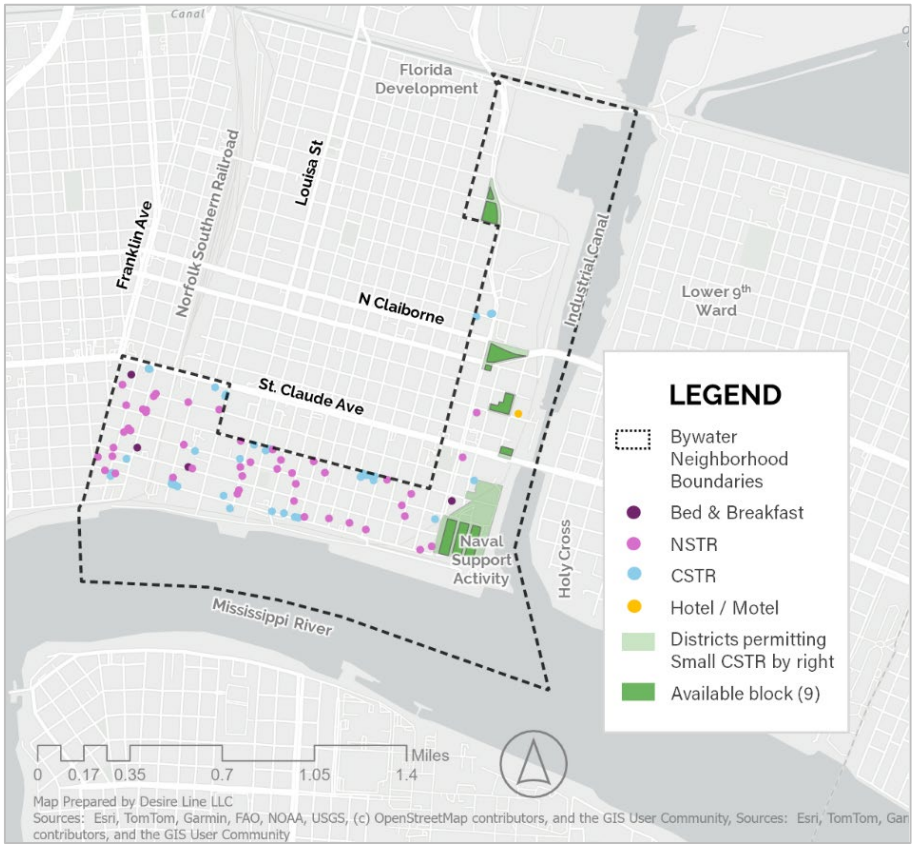


FIGURE 50: BYWATER USE PERMISSIONS: CSTR-S BY RIGHT

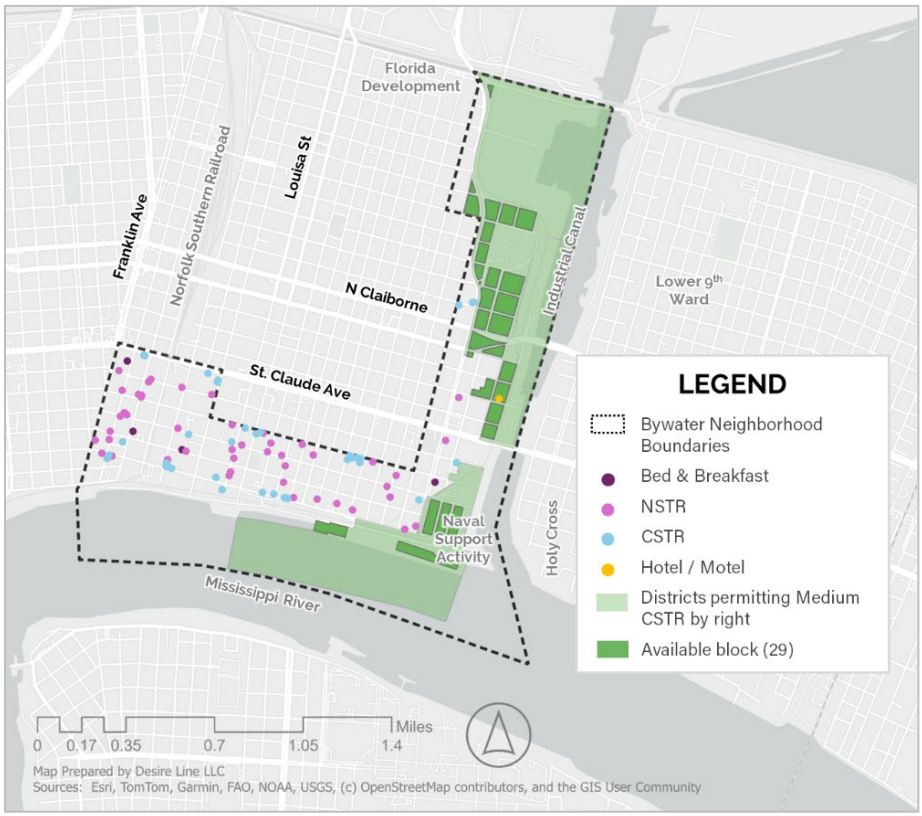


FIGURE 51: BYWATER USE PERMISSIONS: CSTR-M BY RIGHT

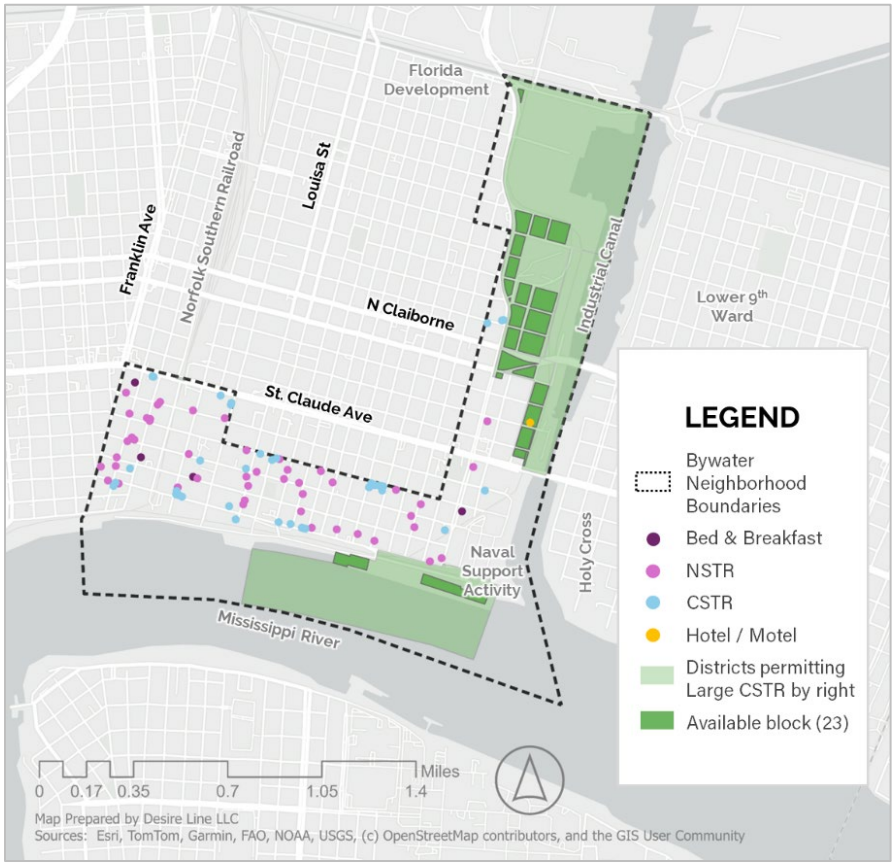


FIGURE 52: BYWATER USE PERMISSIONS: CSTR-L BY RIGHT

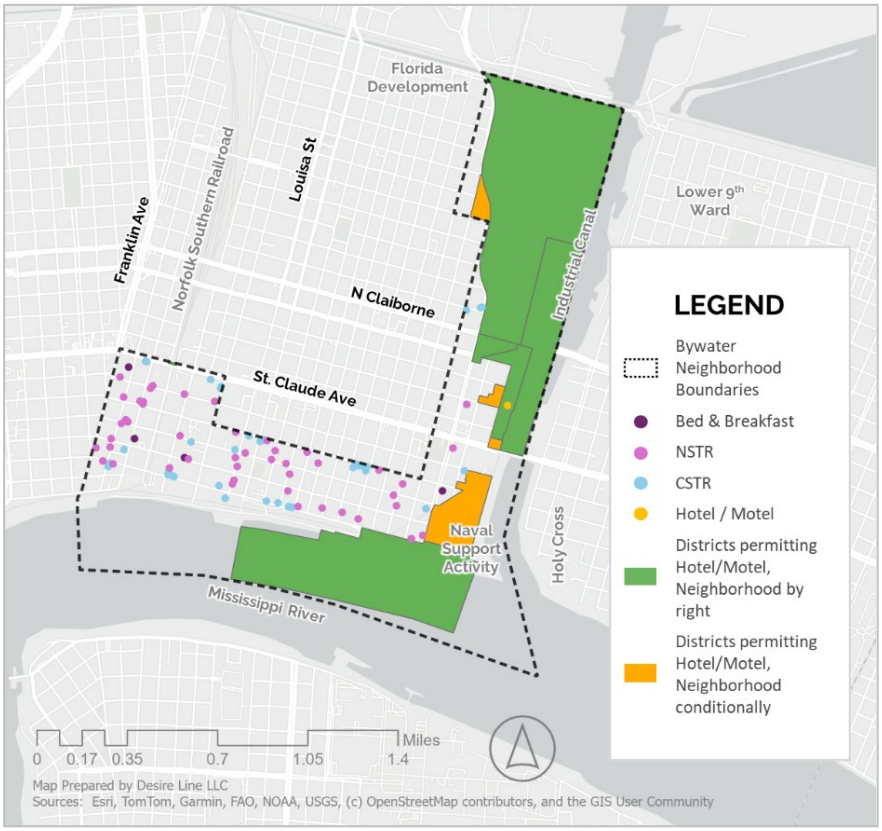


FIGURE 53: BYWATER USE PERMISSIONS: NEIGHBORHOOD HOTEL / MOTEL BY RIGHT AND CONDITIONALLY

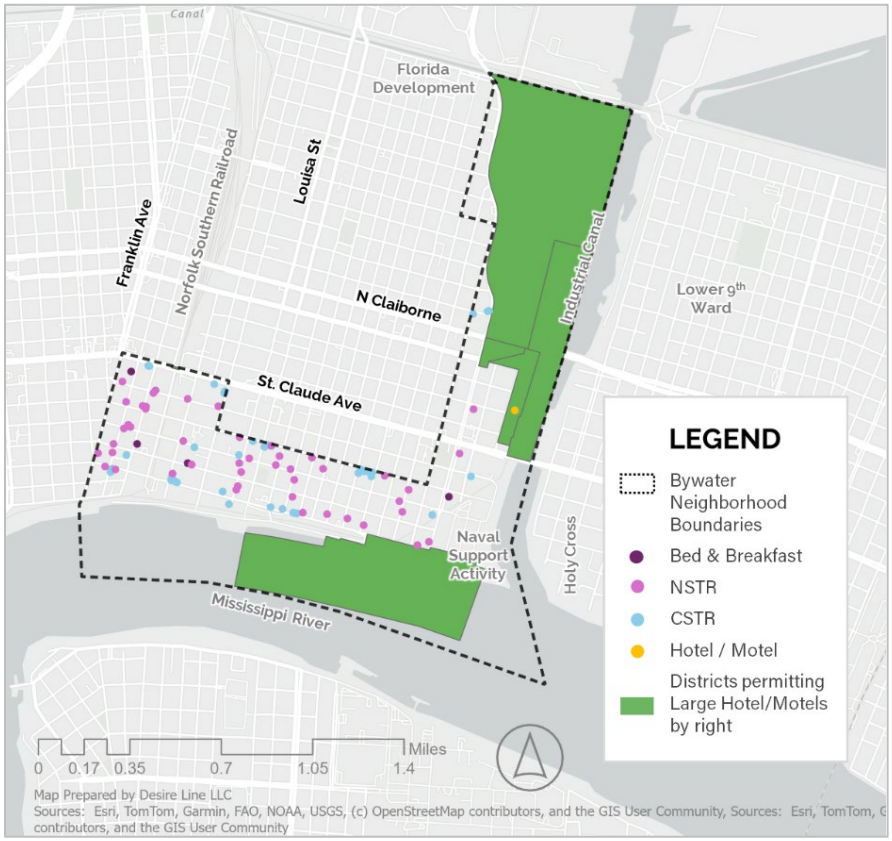


FIGURE 54: BYWATER USE PERMISSIONS: LARGE HOTEL / MOTEL BY RIGHT

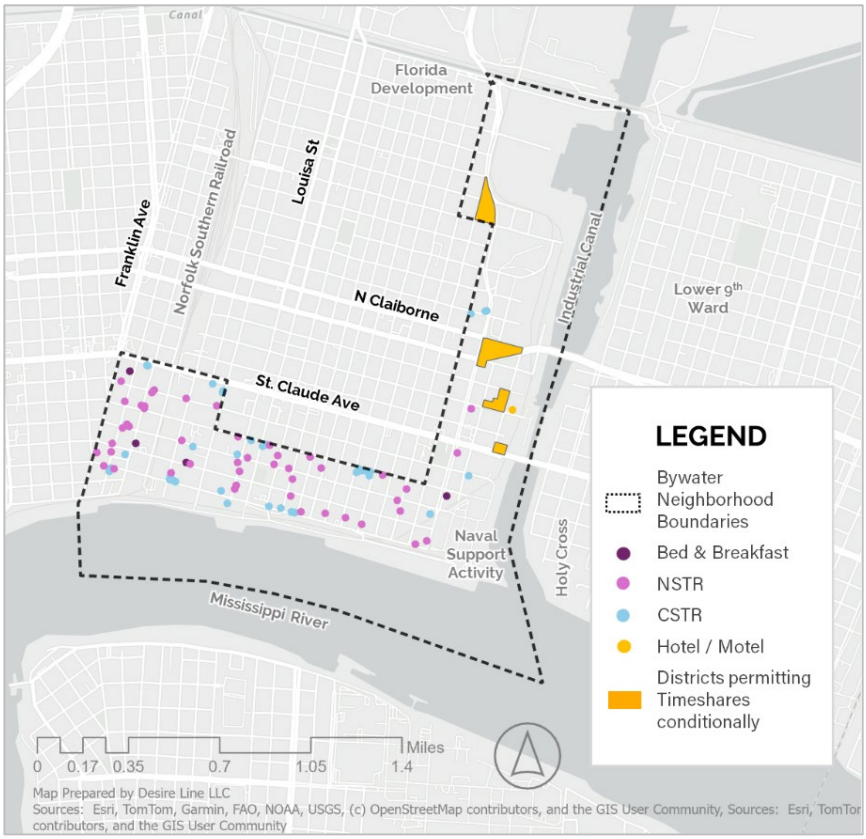


FIGURE 55: BYWATER USE PERMISSIONS: TIMESHARE CONDITIONALLY

4. **Moderate impact neighborhood example: *Algiers Point.***

a. *Prohibited uses.* When applying proposed use permissions in the Algiers Point neighborhood, all of the transient lodging uses are permitted in some districts, either conditionally or by right.

b. *Bed and Breakfast*. Bed and Breakfasts are permitted by right in the Two-Family Residential District (HU-RD2), shaded light green. However, there are only some blocks that have a potential for new Bed and Breakfasts (33) due to the limitation imposed of only one B&B and NSTR on a block. These available blocks are located throughout the Algiers Point neighborhood. See **Figure 57**.

c. *Hostel*. Hostels are permitted by right in the Algiers Point neighborhood in the districts shaded green. There is no change to the proposed district availability, due to the lack of feedback on hostels as a transient lodging use. These districts include the Medium Intensity Mixed-Use District (MU-1) and High Intensity Mixed-Use District (MU-2) and are located along Powder Street and Morgan Street. See **Figure 58**.

d. *CSTR-S (Small)*. CSTR-Ss are permitted by right in those blocks / districts shaded light green, including the Medium Intensity Mixed-Use District (MU-1) and High Intensity Mixed-Use District (MU-2). However, there are only some blocks that have a potential for new CSTR-Ss (4, dark green) due to the limitation imposed of only one CSTR-S, CSTR-M, and CSTR-L on a block. These blocks are only located on Powder Street, Seguin Street, and Morgan Street. See **Figure 59**.

e. *CSTR-M (Medium)*. CSTR-Ms are permitted by right in the Maritime Industrial District (MI), the Medium Intensity Mixed-Use District (MU-1), and the High Intensity Mixed-Use District (MU-2), shaded light green. However, there are only some blocks that have potential for new CSTR-Ms by right (6, dark green) due to the limitation imposed of only one CSTR-S, CSTR-M, and CSTR-L on a block. These blocks are only located along the Mississippi River near the ferry terminal and Powder Street. It is important to note that the CSTR-M limitation is no more than 4 units, or 25% per building, whichever is less. See **Figure 60**.

f. *CSTR-L (Large)*. CSTR-Ls are permitted by right in the Maritime Industrial District (MI). However, there are only some blocks that have a potential for new CSTR-Ls (2, dark green) due to the limitation imposed of only one CSTR-S, CSTR-M, and CSTR-L on a block. These blocks are located along Morgan Street and Powder Street. See **Figure 61**.

g. *Neighborhood Hotel / Motel*. Neighborhood Hotels / Motels are permitted by right in the Maritime Industrial District (MI), shaded green, and conditionally in the Medium Intensity Mixed-Use District (MU-1) and High Intensity Mixed-Use District (MU-2), shaded yellow. These districts are located along the Mississippi River near the ferry terminal, Powder Street, and Morgan Street. See **Figure 62**.

h. *Large Hotel / Motel*. Large Hotels / Motels are permitted by right in the Maritime Industrial District (MI), shaded green. This district is only located along the Mississippi River near the ferry terminal. See **Figure 63**.

i. *Timeshare*. Timeshares are conditionally permitted in the Medium Intensity Mixed-Use District (MU-1) along Seguin Street and Morgan Street, shaded green. There is no change to the proposed district availability, due to the lack of feedback on Timeshares as a transient lodging use. See **Figure 64**.

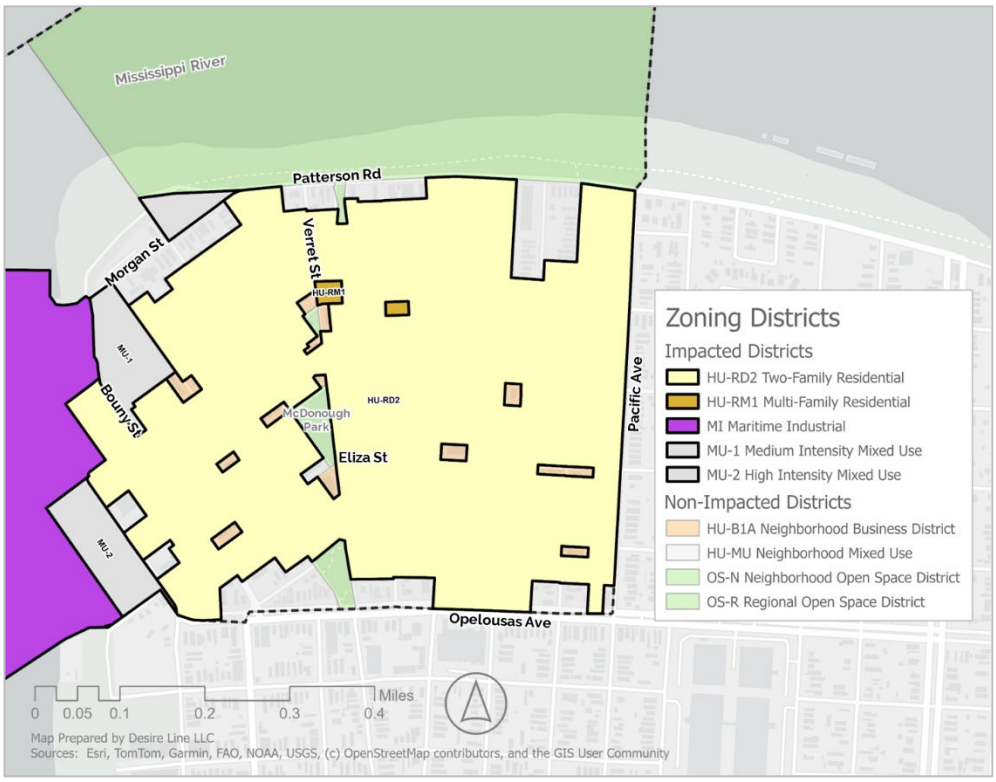


FIGURE 56: ALGIERS POINT IMPACTED ZONING DISTRICTS



FIGURE 57: ALGIERS POINT USE PERMISSIONS: BED AND BREAKFASTS BY RIGHT



FIGURE 58: ALGIERS POINT USE PERMISSIONS: HOSTELS BY RIGHT



FIGURE 59: ALGIERS POINT USE PERMISSIONS: CSTR-S BY RIGHT



FIGURE 60: ALGIERS POINT USE PERMISSIONS: CSTR-M BY RIGHT



FIGURE 61: ALGIERS POINT USE PERMISSIONS: CSTR-L BY RIGHT



FIGURE 62: ALGIERS POINT USE PERMISSIONS: NEIGHBORHOOD HOTEL / MOTEL BY RIGHT AND CONDITIONALLY



FIGURE 63: ALGIERS POINT USE PERMISSIONS: LARGE HOTEL / MOTEL BY RIGHT

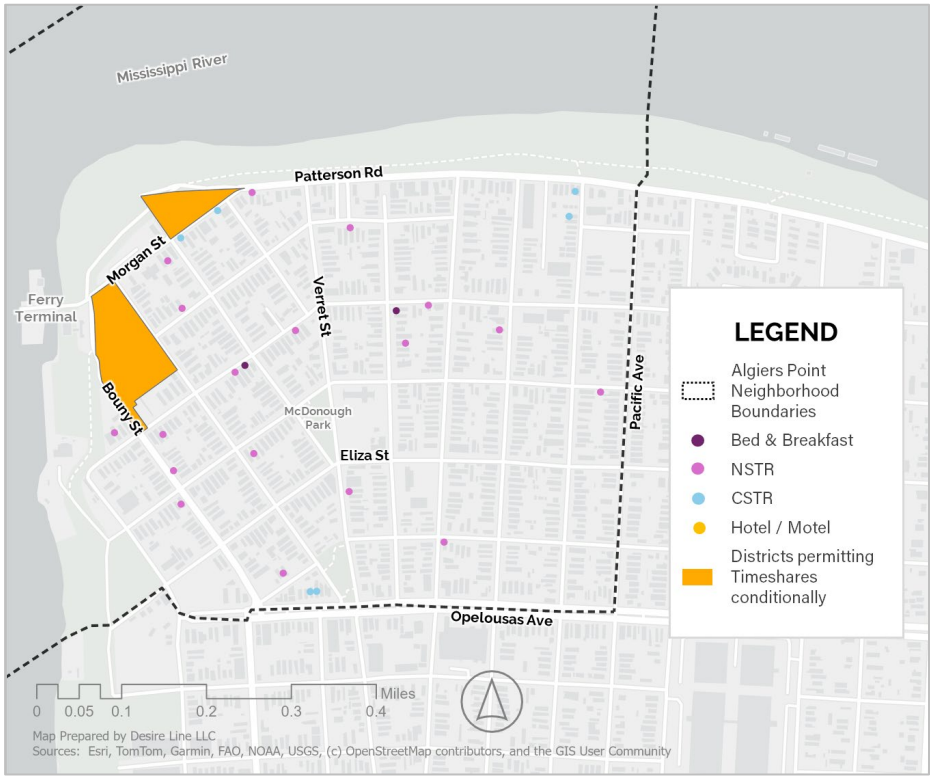


FIGURE 64: ALGIERS POINT USE PERMISSIONS: TIMESHARE CONDITIONALLY

5. **Moderate impact neighborhood example: *French Quarter.***

a. *Prohibited uses*. When applying proposed use permissions in the French Quarter neighborhood, Large Hotels / Motels are prohibited. Any existing property with these uses are already nonconforming and would be grandfathered in if proposed recommendations are adopted by City Council as part of a future text amendment.

b. *Bed and Breakfast.* Bed and Breakfasts are permitted by right in those blocks / zoning districts shaded in light green within the Vieux Carre Commercial District (VCE). New Bed and Breakfasts may only be proposed within 14 available blocks colored in dark green in **Figure 51** due to the density limit of only one B&B and NSTR per block. These available blocks are located along the lower end of Bourbon Street.

c. *Hostel*. Hostels are permitted by right in the French Quarter neighborhood. There is no change to the proposed district availability, due to the lack of feedback on hostels as a transient lodging use. These districts include the Medium Intensity Mixed-Use District (MU-1), Historic Commercial and Mixed-Use District (CBD-2), and Exposition District (CBD-4), and are located along parts of Canal Street and Rampart Street.

d. *Neighborhood Hotel / Motel.* Neighborhood Hotels / Motels are conditionally permitted in the French Quarter within the Medium Intensity Mixed-Use District (MU-1), and permitted by right in the Historic Commercial and Mixed-Use District (CBD-2) and Exposition District (CBD-4). These districts are located along parts of Canal Street and Rampart Street.

e. *CSTR-S (Small)*. Small CSTR-S are permitted by right in the French Quarter within the Vieux Carré Commercial District (VCE), Vieux Carré Entertainment District (VCE-1), Medium Intensity Mixed-Use District (MU-1), Historic Commercial and Mixed-Use District (CBD-2), and Exposition District (CBD-4). Only 24 blocks could be developed with a new CSTR-S due to the density limit of only one B&B, CSTR-S, CSTR-M, CSTR-L, and NSTR per block. These blocks are located along parts of Canal Street, Decatur Street, Bourbon Street, and Rampart Street.

f. *CSTR-M (Medium)*. Medium CSTRs are permitted by right in the Vieux Carré Entertainment District (VCE), Vieux Carré Entertainment District (VCE-1), Medium Intensity Mixed-Use District (MU-1), Historic Commercial and Mixed-Use District (CBD-2), and Exposition District (CBD-4). However, only 24 blocks could be developed with a new CSTR-Ms due to the density limit of only one CSTR-S, CSTR-M, and CSTR-L per block. These blocks are located along Canal Street, Decatur Street, and Bourbon Street. It is important to note that the CSTR-M limitation is no more than 4 units, or 25% per building, whichever is less.

g. *CSTR-L (Large)*. Large CSTRs are permitted by right in the Historic Commercial and Mixed-Use District (CBD-2) and Exposition District (CBD-4). These area are only located along parts of Canal Street and Rampart Street. However, only some blocks could be developed with a new CSTR-L due to the density limit of only one CSTR-S, CSTR-M, and CSTR-L (2 by right).

h. *Timeshare.* Timeshares are allowed by right and conditionally. The by right districts include the Historic Commercial and Mixed-Use District (CBD-2) and Exposition District (CBD-4), and are only located along Canal Street. The conditional district is the Medium Intensity Mixed-Use District (MU-1). There is no change to the proposed district availability, due to the lack of feedback on Timeshares as a transient lodging use.

*All of these recommendations are shown spatially on the following pages in **Figures 65-72.***

FIGURE 65: FRENCH QUARTER IMPACTED ZONING DISTRICTS

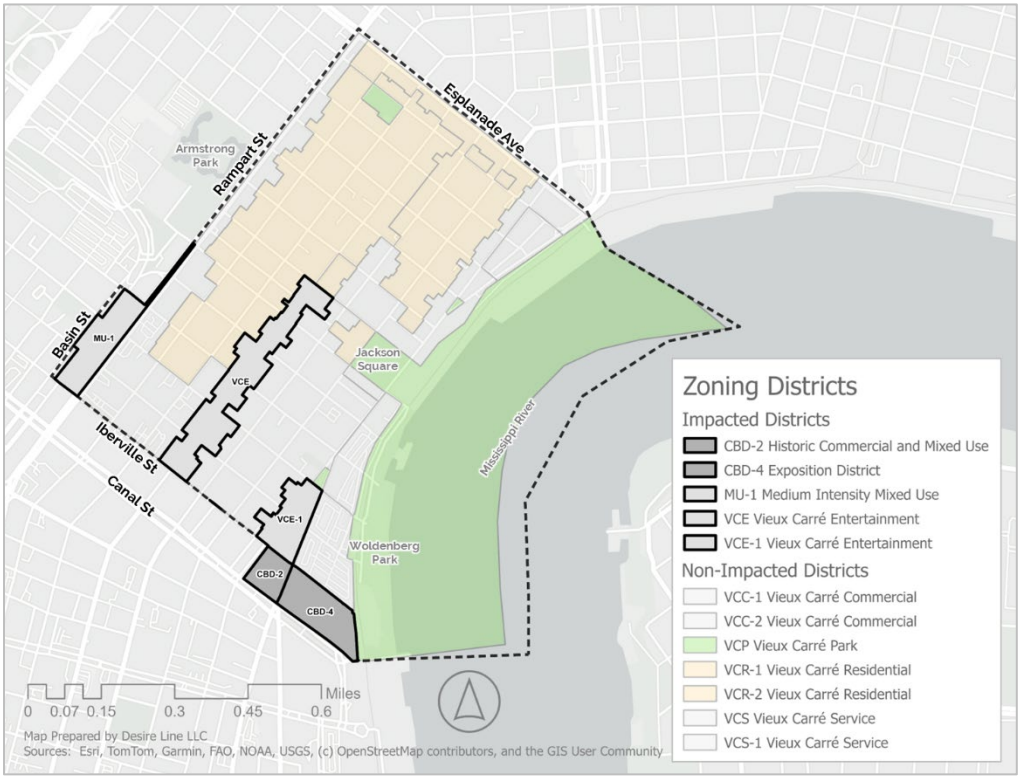


FIGURE 66: FRENCH QUARTER USE PERMISSIONS: BED AND BREAKFASTS BY RIGHT

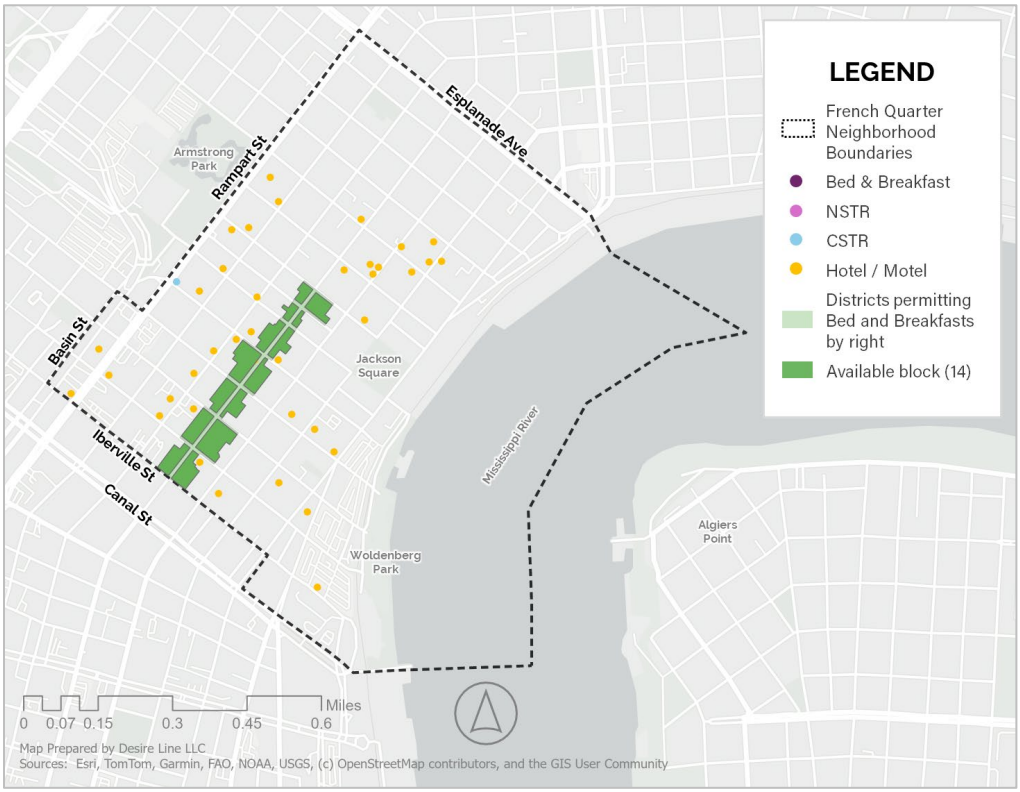


FIGURE 67: FRENCH QUARTER USE PERMISSIONS: HOSTELS BY RIGHT

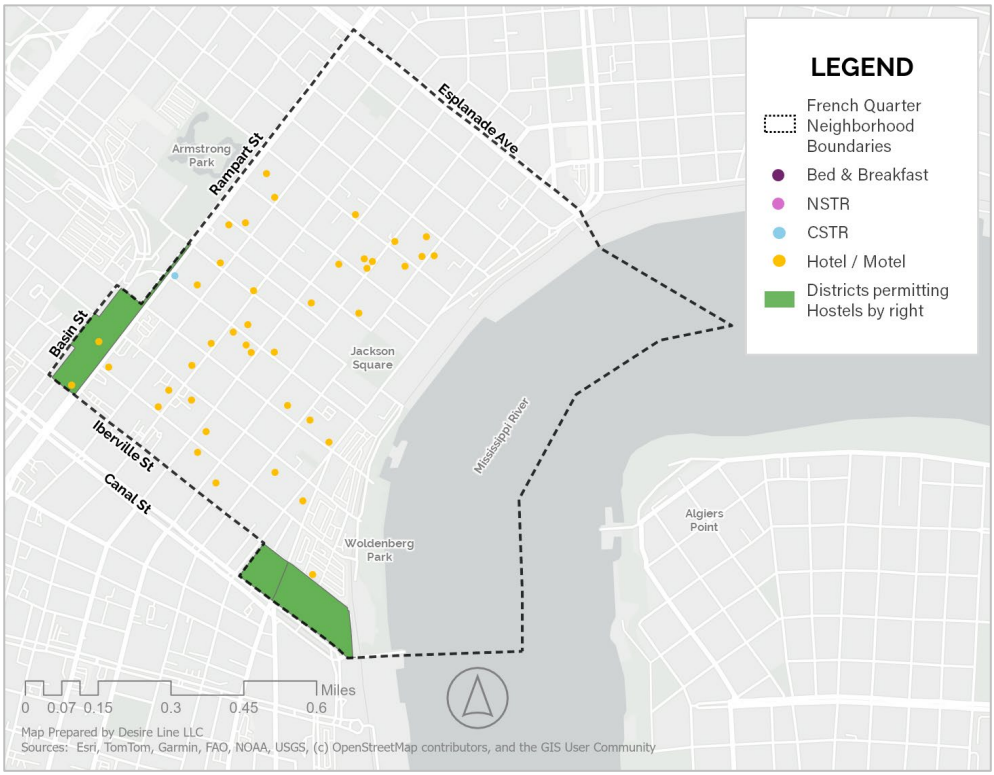


FIGURE 68: FRENCH QUARTER USE PERMISSIONS: NEIGHBORHOOD HOTEL / MOTEL CONDITIONALLY AND BY RIGHT

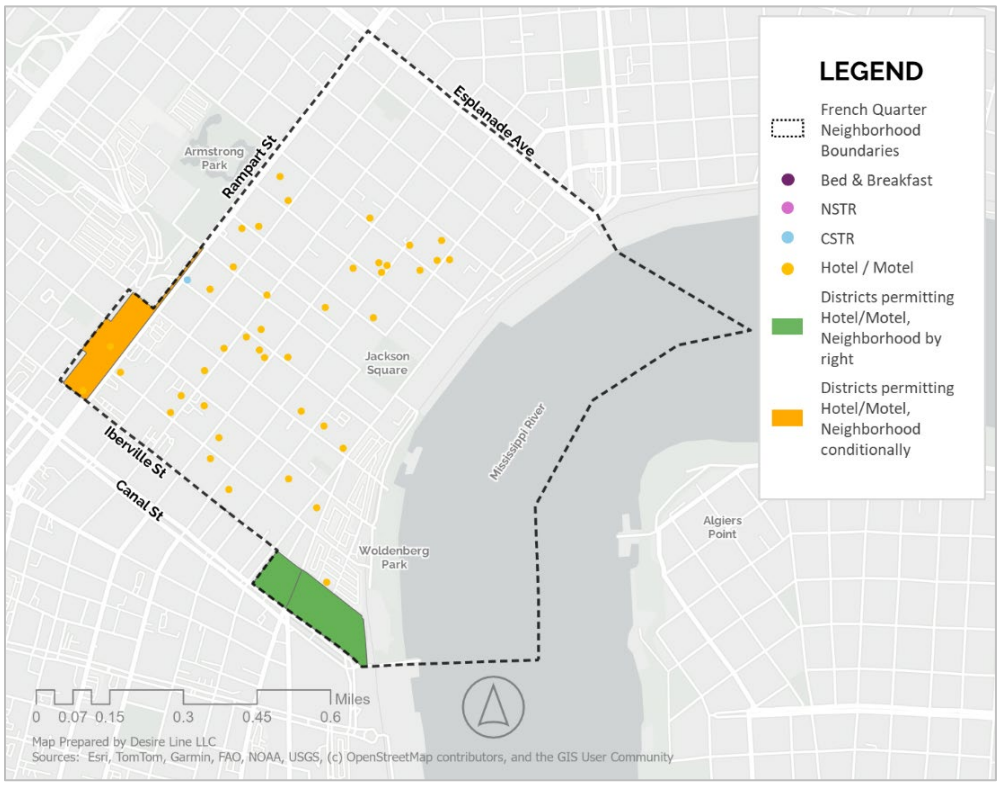


FIGURE 69: FRENCH QUARTER USE PERMISSIONS: CSTR-S BY RIGHT

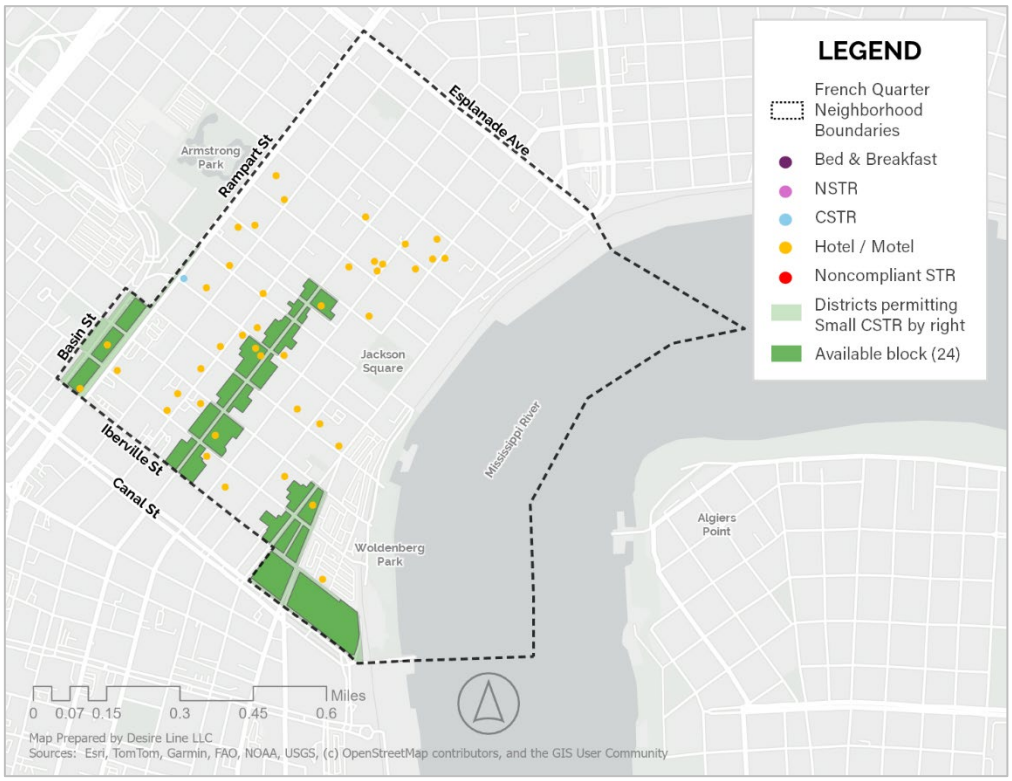


FIGURE 70: FRENCH QUARTER USE PERMISSIONS: CSTR-M BY RIGHT

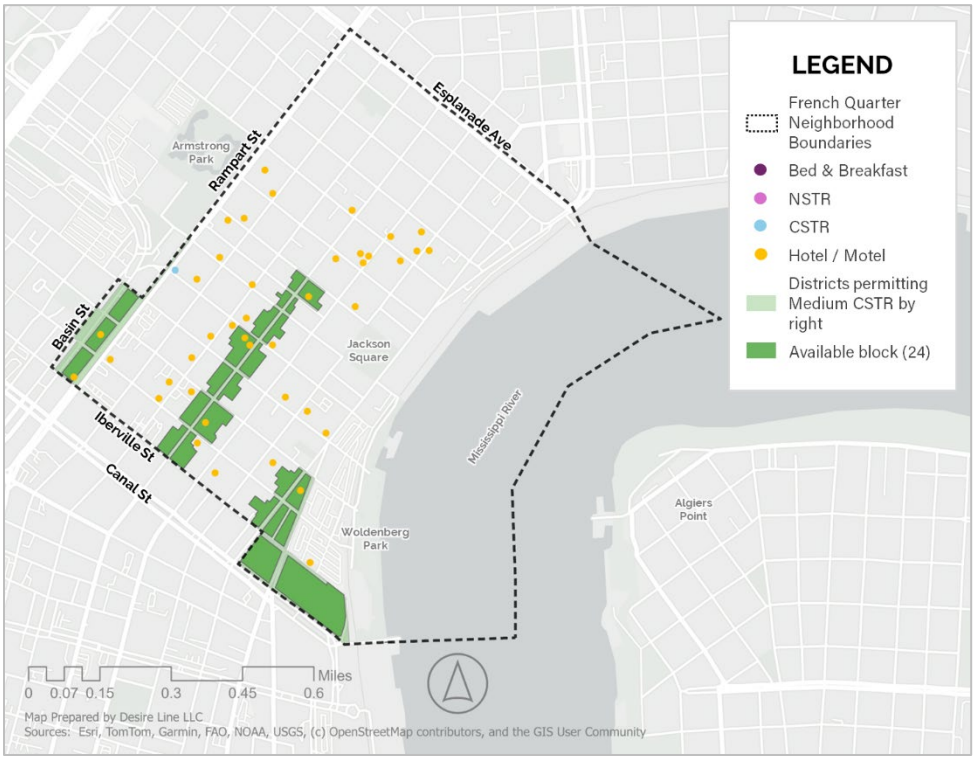


FIGURE 71: FRENCH QUARTER USE PERMISSIONS: CSTR-L BY RIGHT

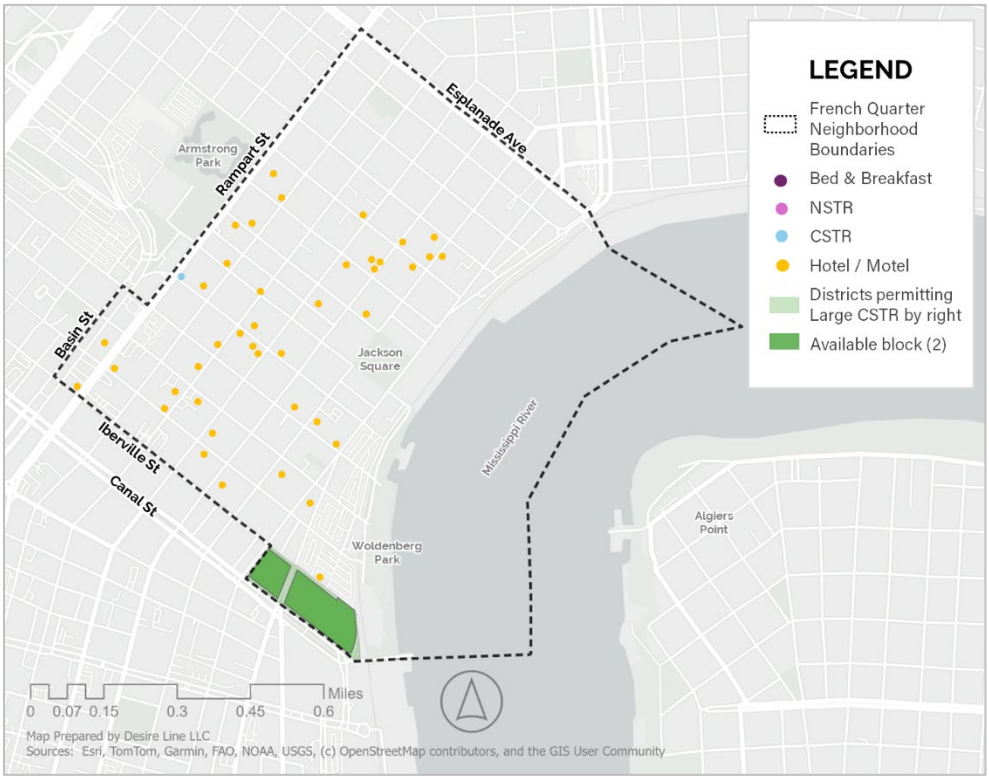
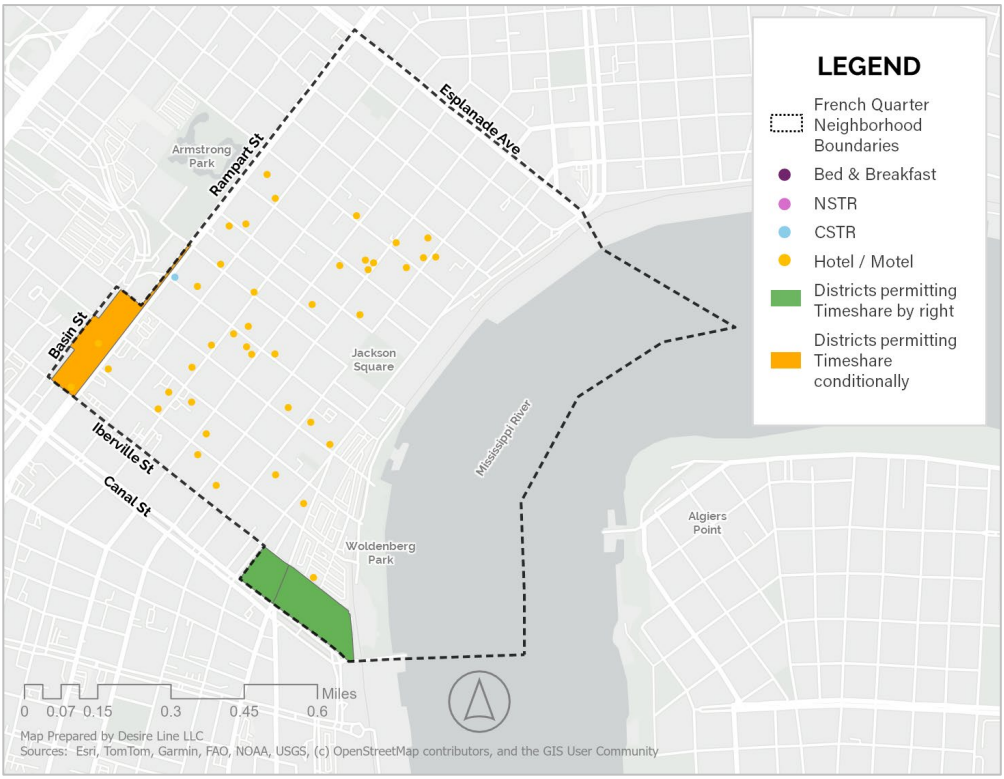


FIGURE 72: FRENCH QUARTER USE PERMISSIONS: TIMESHARE BY RIGHT AND CONDITIONALLY



5. ***Lower impact neighborhood example – Lake Catherine.***

a. *Prohibited uses.* When applying proposed use permissions in Lake Catherine, Hostels, Hotels / Motels (all), and Timeshares are prohibited. Any existing property with these uses would become nonconforming but be grandfathered in if proposed recommendations are adopted by City Council as part of a future text amendment.

b. *Bed and Breakfast.* Bed and Breakfasts are permitted by right in the blocks / districts shaded light green, including the Maritime Mixed-Use District (M-MU), Single-Family Residential District (S-RS), and Multi-Family Residential District (S-RM2). However, there are only some blocks that have a potential for new Bed and Breakfasts (28) due to the limitation imposed of only one B&B and NSTR on a block. These available blocks are located throughout Lake Catherine. See **Figure 74.**

c. *CSTR-S (Small).* CSTR-Ss are permitted by right in the Maritime Mixed-Use District (M-MU), shaded light green. However, there are only some blocks that have a potential for new CSTR-Ss (23, light green) due to the limitation imposed of only one CSTR-S, CSTR-M, and CSTR-L on a block. These blocks are located throughout Lake Catherine. See **Figure 75**.

d. *CSTR-M (Medium).* CSTR-Ms are permitted by right in the Maritime Mixed-Use District (M-MU), shaded light green. However, there are only some blocks that have potential for new CSTR-Ms (23, dark green) due to the limitation imposed of only one CSTR-S, CSTR-M, and CSTR-L on a block. These blocks are located throughout Lake Catherine. It is important to note that the CSTR-M limitation is no more than 4 units, or 25% per building, whichever is less. See **Figure 76.**

e. *CSTR-L (Large).* CSTR-Ls are permitted by right in in the Maritime Mixed-Use District (M-MU), shaded light green. This district is located throughout Lake Catherine. However, there are only some blocks that have potential for new CSTR-Ls (23, dark green) due to the limitation imposed of only one CSTR-S, CSTR-M, and CSTR-L on a block. See **Figure 77.**

All of these recommendations are shown spatially on the following pages in ***Figures 73-77.***

FIGURE 73: LAKE CATHERINE IMPACTED ZONING DISTRICTS

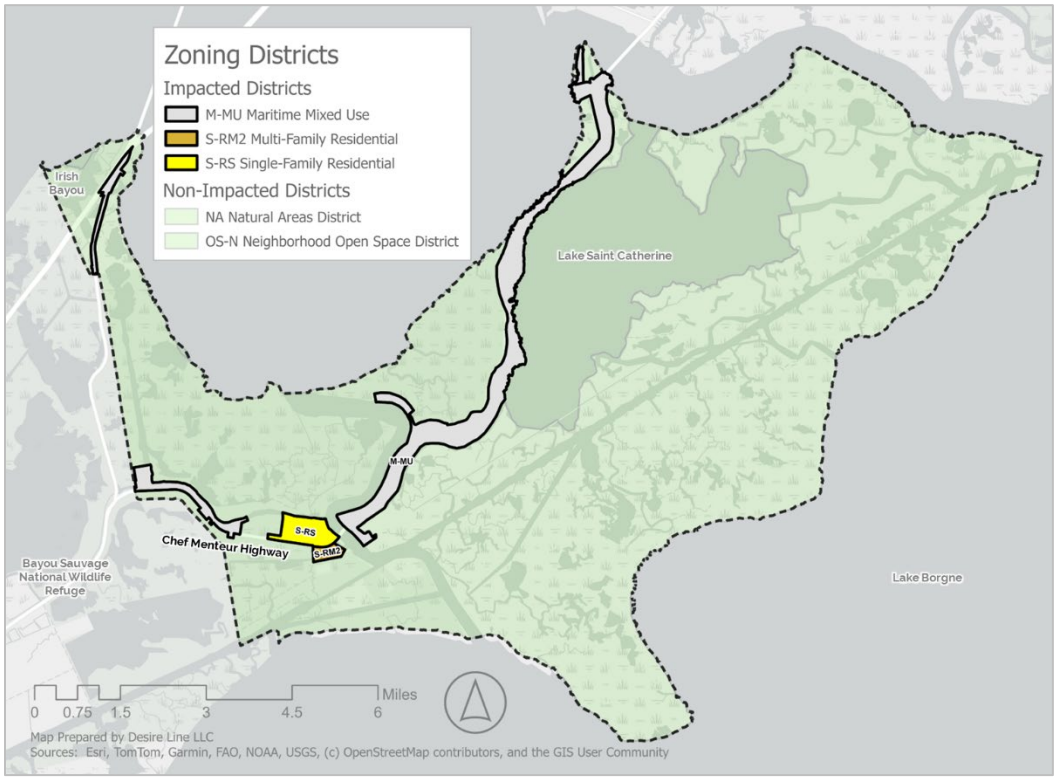


FIGURE 74: LAKE CATHERINE USE PERMISSIONS: BED AND BREAKFAST BY RIGHT

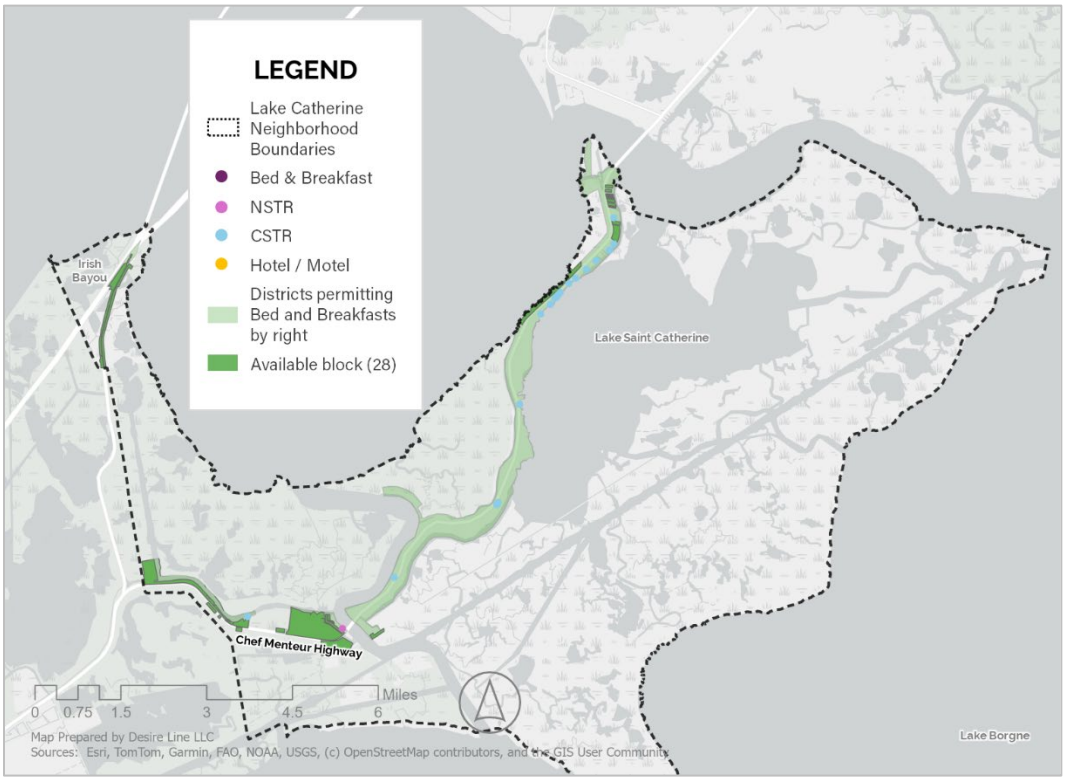


FIGURE 75: LAKE CATHERINE USE PERMISSIONS: CSTR-S BY RIGHT

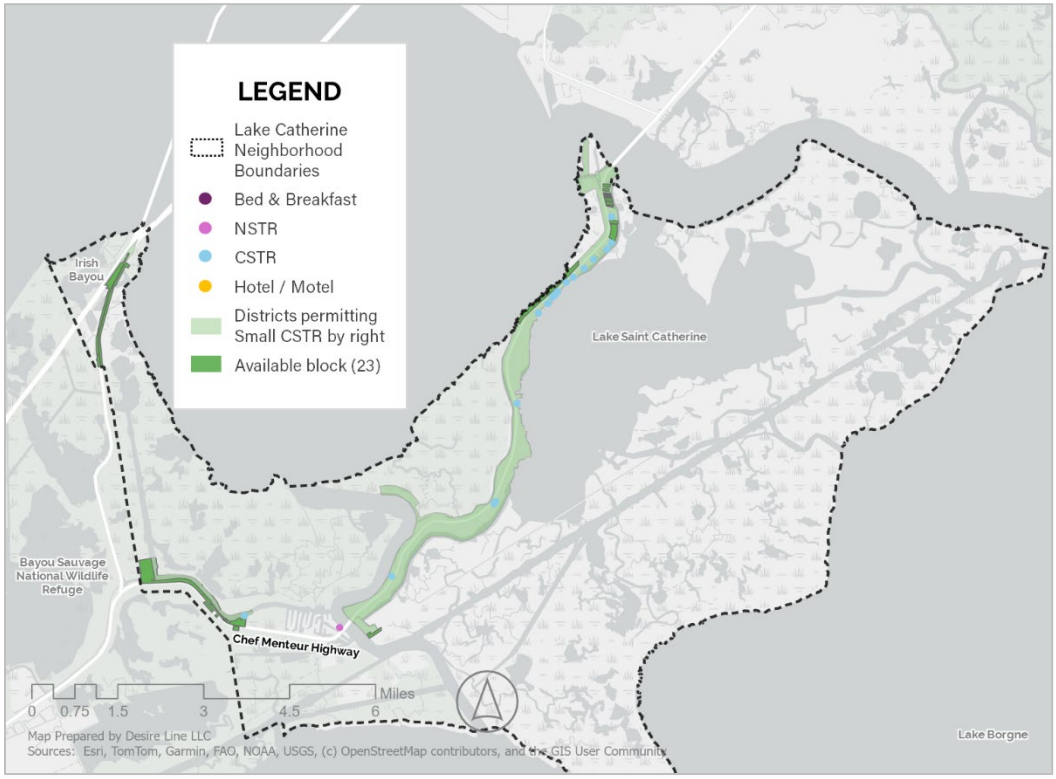


FIGURE 76: LAKE CATHERINE USE PERMISSIONS: CSTR-M BY RIGHT

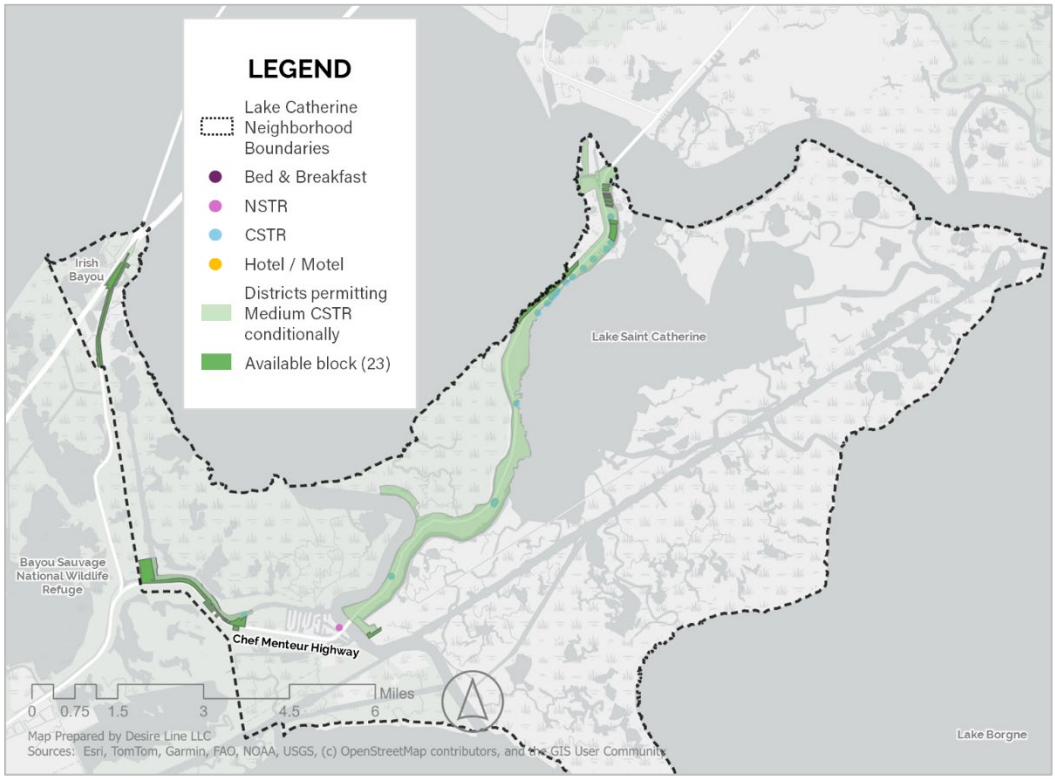
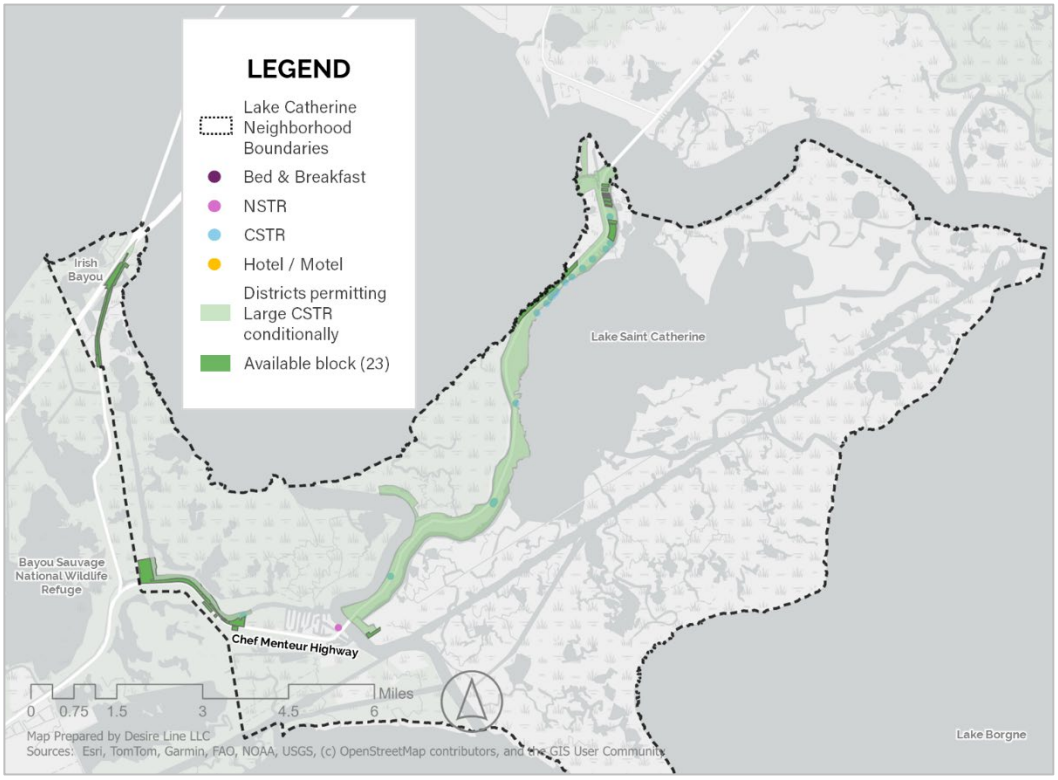


FIGURE 77: LAKE CATHERINE USE PERMISSIONS: CSTR-L BY RIGHT



A full listing of the existing 52 zoning districts, their purpose statements, existing and proposed zoning district use permissions is included in **Table 6**.

TABLE 6: ZONING DISTRICT PURPOSE STATEMENTS – EXISTING AND PROPOSED USES

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
1	Article 7: Open Space Districts	The Open Space Districts provide residents with access to active and passive recreation areas, protect the City's cemeteries, and preserve national resources within the wetlands and coastal areas. In some districts, only limited development is appropriate such as cultural facilities while in other areas the predominant character should emphasize the natural environment.	OS-N	The purpose of the **OS-N Neighborhood Open Space District** is to provide a classification for parks located within neighborhoods that serve as recreation areas for residents in the local area. Neighborhood parks are smaller in scale than regional parks and more limited in the types of recreational uses allowed. The OS-N District is also intended to provide for the preservation of natural environmental features and wildlife habitats at certain locations surrounded by developed neighborhoods, and to provide protection for the City's historic cemeteries.	None	None
2			OS-G	The purpose of the OS-G Greenway Open Space District is to provide a classification for open space greenways that provide a connection between neighborhoods and public amenities such as cultural facilities and larger parks. The physical form of a greenway is typically more linear in nature and accommodates additional modes of transportation such as pedestrian trails and bike paths.	None	None
3			OS-R	The purpose of the OS-R Regional Open Space District is to provide a classification for large parks that draw visitors from the entire region. A regional park includes a variety of recreational areas and uses, but also includes certain ancillary commercial activities such as cultural facilities, performance venues, and restaurants. The OS-R District also includes waterfront recreational activities, such as beaches and public piers.	None	None
4			NA	The purpose of the NA Natural Areas District is to protect and preserve existing natural areas such as wetlands and coastal areas of marsh, estuary or waterway. Very limited development is allowed, and shall be compatible with and cause little impact to these areas. The intent of the NA District is to provide stormwater protection and reduce flooding possibilities due to abnormal tides in Lake Pontchartrain, Lake Borgne, and the various tidal waterways in and adjacent to Orleans Parish.	None	None

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
5			GPD	The purpose of the GPD General Planned Development District is to provide flexibility in the site design and development of land in order to promote its most environmentally sensitive use and to preserve the natural and scenic qualities of wetlands and other natural land features. The GPD District is intended to provide protection for environmentally sensitive areas and encourage development that avoids or minimizes negative impacts and allows for innovative development techniques and flexibility in the development of the site.	Hotel / Motel (C); Short Term Rental, Commercial (C)	Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Large (P)
6			OS-CBD	The purpose of the OS-CBD Central Business Open Space District is to provide a classification for large open space parks in the Central Business Districts that provide a connection between neighborhoods and public amenities that draw in residents from across the City as well as visitors of New Orleans. The OS-CBD District is intended to provide for both recreational uses and certain ancillary low-impact entertainment, commercial, and wellness programming.	None	None
7			OS-AR	The purpose of the OS-AR Armstrong Regional Park District is to provide a classification to establish Louis Armstrong Park in the City's Historic Core as a dedicated cultural resource, locale for community gathering, and conduit for retention of African Culture and spiritual practice. The OS-AR park district includes a majority of passive open space, parks, and history supporting and cultural uses in historic structures.	None	None
8	**Article 8: Rural Development Districts**	The Rural Development Districts address areas of semi-rural development in the city where both residential uses and non-residential uses related to the natural	R-RE	The purpose of the R-RE Rural Residential Estate District is to provide for large-lot, estate-type residential areas that create a low density environment that relates to the natural environment. Certain non-residential uses such as places of worship and recreational uses are also allowed, when compatible with rural residential surroundings.	Bed and Breakfast, Accessory (C)	None

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
9		resources of the area, like agriculture and fishing camps, are found. The character of these areas varies from large estate-type developments to mixed-use developments along the waterfront. Rural Development Districts maintain a relatively low density and are found in areas like lower coast Algiers and Lake Catherine.	M-MU	The purpose of the **M-MU Maritime Mixed-Use District** is to address environmentally-compatible residential and non-residential development in areas adjacent to wetlands and waterbodies, generally located in areas of the city with higher elevation and near existing access roads. The M-MU District is mixed-use in nature, where residential uses are found close to water-related non-residential uses such as fishing camps, seafood processing facilities, and marinas.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Short Term Rental, Commercial (P)	Bed and Breakfast (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P)
10	**Article 9: Historic Core Neighborhoods Residential Districts**	The Historic Core Neighborhoods are the neighborhoods that developed during the City's colonial period, including adjacent areas that continued those development patterns. Consisting of the Vieux Carré, Faubourg Marigny, Tremé, Bywater, and portions of surrounding neighborhoods, the Historic Core Neighborhoods reflect a scale resulting from historically pedestrian movement. The regulations of the residential districts of the Historic Core Neighborhoods	VCR-1	The VCR-1 **Vieux Carré Residential District** is intended to preserve and protect existing residential development to maintain the authentic character of the historic Vieux Carré. Incompatible uses and building modifications are excluded from this residential district, and rehabilitation and adaptive reuse are encouraged.	None	None
11			VCR-2	The VCR-**2 Vieux Carré Residential District** is intended to preserve and protect existing residential development and to maintain the authentic character of the historic Vieux Carré while permitting moderately higher density than allowed in the VCR-1 District. Incompatible uses and building modifications are excluded from this residential district, and rehabilitation and adaptive reuse are encouraged.	None	None
12			HMR-1	The HMR-1 **Historic Marigny/Tremé/Bywater** Residential District is intended to protect existing residential development and to maintain a desirable character of such development within the historic Marigny/Tremé/Bywater areas. Incompatible uses are excluded from this residential district. Rehabilitation, renovation, and adaptive reuse particularly of historically significant buildings are encouraged.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C)	Bed and Breakfast (P)

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
13		preserve and reflect the historic development pattern. Each of the residential districts within the Historic Core Neighborhoods contains a mix of dwelling types, creating a dense residential environment.	HMR-2	The HMR-2 Historic Marigny/Tremé/Bywater Residential District is intended to protect existing residential development and to maintain a desirable character of such development within the historic Marigny/Tremé/Bywater areas. Incompatible uses are excluded from this residential district. Rehabilitation, renovation, and adaptive reuse particularly of historically significant buildings are encouraged. Smaller lot areas and higher floor-to-area ratios are permitted in the HMR-2 Historic Marigny/Tremé/Bywater Residential District than those allowed in the HMR-1 Historic Marigny/Tremé/Bywater Residential District.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C)	Bed and Breakfast (P)
14			HMR-3	The HMR-3 Historic Marigny/Tremé/Bywater Residential District is intended to provide for single-family dwellings and two-family dwellings, accommodate small-scale multi-family dwellings of three to four units, protect the existing residential development and maintain the desirable character of such development within the historic Marigny/Tremé/Bywater areas. Incompatible uses are excluded from this residential district. Rehabilitation, renovation, and adaptive reuse particularly of historically significant buildings are encouraged.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C)	Bed and Breakfast (P)
15	**Article 10: Historic Core Neighborhoods Non-Residential Districts**	The Historic Core Neighborhoods are the neighborhoods that developed during the City's colonial period, including adjacent areas that continued those development patterns. Consisting of the Vieux Carré, Faubourg Marigny, Tremé, Bywater, and portions of surrounding neighborhoods, the Historic Core	VCC-1	The VCC-1 Vieux Carré Commercial District is intended to provide for restricted retail stores and service establishments that will attract and service local residents and tourists, and that will not adversely affect the character of nearby residences or detract from the overall character of the Vieux Carré.	None	None
16			VCC-2	The VCC-2 Vieux Carré Commercial District is intended to provide for retail and service establishments that attract and service local residents and visitors, permitting more intensive commercial uses than in the VCC-1 District, yet protecting the quality of life of the adjacent residential uses and the overall character of the Vieux Carré. This district includes the major shopping area of the Vieux Carré.	None	None

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
17		Neighborhoods reflect a scale resulting from historically pedestrian movement. The non-residential districts of the Historic Core Neighborhoods contain regulations to preserve and reflect the historic development pattern and the dense mixed-use environment. The districts allow for a variety of uses, including residential, commercial and entertainment, integrated throughout the district as a whole and at times within a single structure.	VCE	The purpose of the Vieux Carré Entertainment district is to provide for entertainment places and restricted retail stores that attract and serve visitors and local residents.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Short Term Rental, Commercial (P)	Bed and Breakfast (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P)
18			VCE-1	The purpose of this district is to provide for entertainment places and restricted retail stores along Decatur and N. Peters Streets that attract and serve visitors and local residents.	None	Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P)
19			VCS	The VCS Vieux Carré Service District is intended to provide for the redevelopment of areas near the Mississippi River that were historically developed with industrial and commercial uses as a mixed-use area, with ground-floor retail and commercial uses and residential uses above. This district also promotes the improvement, beautification and redevelopment of existing surface parking lots and their redevelopment with structured parking and a mixture of commercial and residential uses. Existing commercial uses that do not adversely affect residential uses or the overall character of the Vieux Carré are also intended to be accommodated in the VCS-1 District	None	None
20			VCS-1	The VCS-1 Vieux Carré Service District is intended to provide for the redevelopment of areas near the Mississippi River that were historically developed with industrial and commercial uses as a mixed-use area, with ground-floor retail and commercial uses and residential uses above. This district also promotes the improvement, beautification and redevelopment of existing surface parking lots and their redevelopment with structured parking and a mixture of commercial and residential uses. Existing commercial uses that do not adversely affect residential uses or the overall character of the Vieux Carré are also intended to be accommodated in the VCS-1 District. Hotels may be considered as part of the redevelopment of historic structures through the conditional use process.	None	None

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
21			VCP	The VCP Vieux Carré Park District is intended to provide for parks, public facilities, and associated uses in the Vieux Carré and along the Vieux Carré riverfront. Parks and open space are encouraged and are permitted uses. Conditional use review is required for all other uses to ensure compatibility of the character of the Vieux Carré with the maritime use and scale of the waterfront.	None	None
22			HMC-1	The HMC-1 Historic Marigny/Tremé/Bywater Commercial District is intended to provide for restricted retail stores and service establishments that will attract tourists and local residents without adversely affecting either the character of the historic Marigny/Tremé/Bywater area or nearby residences. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Short Term Rental, Commercial (C)	None
23			HMC-2	The HMC-2 Historic Marigny/Tremé/Bywater Commercial District is intended to permit more intensive commercial uses than the HMC-1 District, yet protect the historic character of the Marigny/Tremé/Bywater area. The district includes the peripheral properties in Marigny/Tremé/Bywater that front on major traffic arteries and can provide access for more intense commercial uses. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Hostel (P); Hotel / Motel (P), Short Term Rental, Commercial (P)	Hostel (P)
24			HM-MU	The HM-MU Historic Marigny/Tremé/Bywater Mixed-Use District is intended to provide a mixed-use environment of light industrial, commercial, and residential uses that would not adversely affect the historic character of the neighborhood. Compatibility of such uses and structures with one another and with the area is encouraged through the development review process. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Hotel / Motel (C), Short Term Rental, Commercial (P)	None

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
25	**Article 11: Historic Urban Neighborhoods Residential Districts**	Historic Urban Neighborhoods are those areas of the city that were developed predominantly in the mid to late 19th century. The development pattern of Historic Urban Neighborhoods is characterized by a higher density and pedestrian scale environment with limited accommodation for the automobile. Within Historic Urban Neighborhoods, many of the residential neighborhoods contain traditional corner stores that serve the immediate residents and are in proximity to commercial clusters of local businesses. The residential districts of the Historic Urban Neighborhoods contain regulations that create and maintain the established scale and character of these areas, with a higher residential	HU-RS	The HU-RS Single-Family Residential District is intended to provide for the traditional, pre-World War II single-family residential development. These areas are urban single-family neighborhoods of higher density and smaller setbacks than seen in the post-World War II areas of the City. Limited non-residential uses such as places of worship, historic neighborhood commercial establishments, and recreational facilities that are compatible with surrounding residential neighborhoods may be allowed.	Bed and Breakfast, Accessory (C)	Bed and Breakfast (P)
26			HU-RD1	The HU-RD1 Two-Family Residential District is intended to provide for the creation and maintenance of urban neighborhoods consisting of compact residential areas having a mix of housing types. The district accommodates two-family developments on smaller lots in older, more densely populated sections of the City. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing. Limited non-residential uses such as places of worship, historic neighborhood commercial establishments, and recreational facilities that are compatible with surrounding residential neighborhoods may be allowed.	Bed and Breakfast, Accessory (C)	Bed and Breakfast (P)
27			HU-RD2	The HU-RD2 Two-Family Residential District is intended to provide for two-family development on smaller lots in older, densely populated urban sections of the City mixed with detached single-family dwellings. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing. Limited non-residential uses such as places of worship, historic neighborhood commercial establishments, and recreational facilities that are compatible with surrounding residential neighborhoods may be allowed.	Bed and Breakfast, Accessory (C)	Bed and Breakfast (P)

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
28		density, acknowledges many of these areas were developed without accommodation for the auto, and respect the variety of setbacks seen in residential neighborhoods.	HU-RM1	The HU-RM1 Multi-Family Residential District is intended to provide for low to medium residential densities appropriate for a variety of housing types such as single-family, two-family, townhouse and lower density multi-family dwellings. The district is intended to maintain a primarily residential environment with a variety of lower density dwelling types therefore the building height is limited to three stories. Limited non-residential uses such as places of worship, historic neighborhood commercial establishments, and recreational facilities that are compatible with surrounding residential neighborhoods may be allowed.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C)	Bed and Breakfast (P)
29			HU-RM2	The HU-RM2 Multi-Family Residential District is intended to provide for moderate density low-rise multi-family development of up to four stories as well as townhouse developments. This district may serve as a transition zone between single- and two-family neighborhoods and adjacent higher intensity land uses. Limited non-residential uses such as places of worship, historic neighborhood commercial establishments, and recreational facilities that are compatible with surrounding residential neighborhoods may be allowed.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C)	Bed and Breakfast (P)
30	**Article 12: Historic Urban Neighborhoods Non-Residential Districts**	Historic Urban Neighborhoods are those areas of the city that were developed predominantly in the mid to late 19th century. The development pattern of Historic Urban Neighborhoods is characterized by a higher density and pedestrian scale environment with	HU-B1A	The HU-B1A Neighborhood Business District is intended to address an individual parcel or small cluster of parcels in non-residential use that exist within residential areas that have historically served the neighborhood and are located on a corner, including established corner stores. These historic neighborhood business uses are consistent with the character of the surrounding neighborhood and are intended to serve the immediate area with minimal impact on the surrounding residential uses. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C)	None

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
31		limited accommodation for the automobile. Within Historic Urban Neighborhoods, many of the residential neighborhoods contain traditional corner stores that serve the immediate residents and are in close proximity to commercial clusters of local businesses. The non-residential districts of the Historic Urban Neighborhoods address the small-scale commercial areas have become integral parts of older neighborhoods. These range from pedestrian-oriented commercial clusters at the intersection of arterial streets, the traditional corner store, and mixed-use corridors. The regulations are intended to control the types of uses allowed and the scale of development to encourage their vitality while maintaining compatibility with nearby residential areas.	HU-B1	The HU-B1 Neighborhood Business District is intended for commercial areas that predominantly serve the needs of the nearby residential neighborhoods. The general character of this type of development should be sensitive to and compatible with its residential surroundings. In addition to commercial uses, this district provides for single-family dwellings, two-family dwellings and can accommodate small-scale multi-family dwellings. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C)	None
32			HU-MU	The HU-MU Neighborhood Mixed-Use District is intended for areas of mixed-use development that are close to residential neighborhoods. The district regulations are designed to encourage mixed-use areas that are compatible with adjacent or nearby land uses and pedestrian-oriented in character. In the HU-MU District, active retail and personal service uses along the ground floor with residential uses above are encouraged. A variety of residential dwellings are also allowed. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Hotel / Motel (C); Short Term Rental, Commercial (P)	None

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
33	Article 13: Suburban Neighborhoods Residential Districts	Suburban Neighborhoods developed primarily in the latter half of the 20th Century. These areas are characterized by lower density development, including neighborhoods of single-family development on lots of various sizes and more spacious setbacks between homes than found in older areas of the City with a generally uniform front setback within each square. Commercial areas within the Suburban Neighborhoods tend to be physically separated from residential areas and have few, if any, ground floor residential uses. These areas are generally located along arterial streets and typically provide accommodation for the automobile, reflecting a more suburban style of development. The residential districts of Suburban Neighborhoods	S-RS	The S-RS Single-Family Residential District is intended for single-family residential neighborhoods developed after World War II where a more uniform lotting pattern is evident with larger, generally uniform setbacks. Limited non-residential uses such as places of worship that are compatible with surrounding residential neighborhoods may be allowed.	Bed and Breakfast, Accessory (C)	Bed and Breakfast (P)
34			S-RD	The S-RD Two-Family Residential District is intended for use in newer areas of the City to facilitate the creation and maintenance of a more compact development type, where there may be a mix of housing types, including two-family and townhouse dwellings. This district also allows higher residential densities when a project is providing significant public benefits such a long-term affordable housing. Limited non-residential uses such as places of worship that are compatible with surrounding residential neighborhoods may be allowed.	Bed and Breakfast, Accessory (C)	Bed and Breakfast (P)
35			S-RM1	The S-RM1 Multi-Family Residential District is intended to maintain a residential environment that permits a variety of dwelling types. Population density is maintained in the medium range, and multi-family buildings up to four stories are permitted. Limited non-residential uses such as places of worship that are compatible with surrounding residential neighborhoods may be allowed.	Bed and Breakfast, Accessory (C)	Bed and Breakfast (P)
36			S-RM2	The S-RM2 Multi-Family Residential District is intended to maintain a residential environment that permits a variety of dwelling types. Population density is maintained in the medium range, and multi-family buildings up to four stories are permitted. The district is intended for suburban multi-family areas. Limited non-residential uses such as places of worship that are compatible with surrounding residential neighborhoods may be allowed.	Bed and Breakfast, Accessory (C)	Bed and Breakfast (P)

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
37		contain regulations that create and maintain living environments that preserve and reflect a form of lower density development. Within Suburban Neighborhoods, the residential districts gradually increase in density, such that the general neighborhood character is a transition from single-family through multi-family that may abut or be in closer proximity to commercial districts.	S-LRS1	The S-LRS1 Lakeview Single-Family Residential District is intended to provide for and encourage low density single-family residential development of a relatively spacious character, together with places of worship, recreational facilities, and accessory uses as may be necessary or typical for residential surroundings, in such a manner as to preserve the distinctive character of the Lakeview area. The district also is intended to provide for the maintenance of existing residential densities as well as opportunities for compatible residential growth.	Bed and Breakfast, Accessory (C)	Bed and Breakfast (P)
38			S-LRS2	The S-LRS2 Lake Vista and Lake Shore Single-Family Residential District is intended to provide for and encourage low-density single-family residential development of a relatively spacious character consistent with the unique development pattern of the Lake Vista and Lake Shore areas together with places of worship, recreational facilities, and accessory uses as may be necessary or typical for residential surroundings.	None	Bed and Breakfast (P)
39			S-LRS3	The S-LRS3 Lakewood and Country Club Gardens Single-Family Residential District is intended to provide for and encourage low-density single-family residential development of a relatively spacious character in the Lakewood area, together with places of worship, recreational facilities, and accessory uses as may be necessary or typical for residential surroundings. This district is also intended to protect existing development of this character. Greater lot widths are required in the S-LRS3 District than in the S-LRS1 Lakeview Single-Family Residential District.	None	Bed and Breakfast (P)
40			S-LRD1	The S-LRD1 Lake Vista Two-Family Residential District is intended to provide for two-family development consistent with the historic character of development in the Lake Vista area, together with places of worship, recreational facilities, and accessory uses as may be necessary or typical for residential surroundings. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.	None	Bed and Breakfast (P)

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
41			S-LRD2	The S-LRD2 Lakewood/Parkview Two-Family Residential District is intended to provide for two-family development on smaller lots of record in more densely populated sections of the Lake Area, together with places of worship, recreational facilities, and accessory uses as may be necessary or typical for residential surroundings. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.	Bed and Breakfast, Accessory (C)	Bed and Breakfast (P)
42			S-LRM1	The S-LRM1 Lake Area Low-Rise Multi-Family Residential District is intended to provide for low-rise, medium density multi-family residential development in the Lake Area in proximity to single-family and two-family residential development.	Bed and Breakfast, Accessory (C)	Bed and Breakfast (P)
43			S-LRM2	The S-LRM2 Lake Area High-Rise Multi-Family Residential District is intended to provide for medium to high-rise, high density multi-family residential development in proximity to single-family and two-family residential development, neighborhood business, general commercial, or marina areas.	Bed and Breakfast, Accessory (C)	Bed and Breakfast (P)
44	**Article 14: Suburban Neighborhoods Non-Residential Districts**	Suburban Neighborhoods developed primarily in the latter half of the 20th Century. These areas are characterized by lower density development, including neighborhoods of single-family development on lots of various sizes and more spacious setbacks between homes than found in older areas of the City with a generally uniform front setback within each square. Commercial areas within the Suburban Neighborhoods tend	S-B1[5]	The S-B1 Neighborhood Business District is intended to provide primarily for retail shopping and personal service uses that primarily serve nearby residential neighborhoods. The general character of this type of development should be sensitive to and compatible with more suburban residential surroundings.	None	None
45			S-B2[6]	The S-B2 Pedestrian-Oriented Corridor Business District is intended for clusters of pedestrian-oriented business uses generally located along corridors. The district regulations are designed to encourage compatibility with adjacent or nearby suburban residential uses and maintain the pedestrian-oriented character of the area.	Short Term Rental, Commercial (P)	Short Term Rental, Commercial – Small (P)
46			S-LB1[5&7]	The S-LB1 Lake Area Neighborhood Business District is intended to provide for small offices, retail shopping and personal services uses, to be developed either as a unit or in individual parcels, to serve the needs of nearby low-density residential neighborhoods in a manner compatible with adjacent residential uses.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C)	Short Term Rental, Commercial – Small (P)

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
47		to be physically separated from residential areas and have few, if any, ground floor residential uses. These areas are generally located along arterial streets and typically provide accommodation for the automobile, reflecting a more suburban style of development. The non-residential districts of Suburban Neighborhoods contain regulations that create and maintain environments that encourage lower intensity commercial development. Non-residential districts reflect a pattern of commercial development oriented toward a concentration of commercial uses in business district environments, rather than commercial uses interspersed throughout residential areas.	S-LB2[5&8]	The S-LB2 Lake Area Neighborhood Business District is intended to provide for larger retail shopping venues and personal services uses, to be developed either as a unit or in individual parcels, to serve the needs of a relatively nearby small area of low to medium density residential neighborhoods.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Short Term Rental, Commercial (P)	Short Term Rental, Commercial – Small (P)
48			S-LC[9]	The S-LC Lake Area General Commercial District is intended to provide sufficient space in appropriate locations for a wide variety of commercial and miscellaneous service activities, generally serving a wide area and located particularly along certain existing major thoroughfares. The district is intended for application in intensely developed areas. Tall buildings are permitted, no front yards are required, and sign regulations are less restrictive than those in other business districts. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Hostel (C); Hotel / Motel (C); Short Term Rental, Commercial (P); Timeshare (P)	Hostel (C); Hotel / Motel, Neighborhood (P); Short Term Rental, Commercial – Medium (P); Timeshare (P)
49			S-MU	The S-MU Suburban Neighborhood Mixed-Use District is intended for areas of multi-family residential development to be developed as mixed-use areas, with ground floor neighbor-serving commercial uses and residential uses above. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing. Commercial uses that primarily serve nearby residential surroundings are encouraged.	Bed and Breakfast, Accessory (C); Short Term Rental, Commercial (P)	Short Term Rental, Commercial – Small (P)
50			S-LP	The S-LP Lake Area Neighborhood Park District is intended to provide for small neighborhood-scale passive open space and recreational areas intended to compliment existing residential neighborhoods or transportation corridors. Such land may include small parks and recreation space, open space, greenways, floodways, trails, and lands with unique physical, aesthetic, or cultural characteristics. It is intended that these areas provide opportunities for passive outdoor recreation, preserve scenic views, and protect fragile environmental areas.	None	None

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
51			S-LM	The S-LM Lake Area Marina District is intended to accommodate the variety of commercial, open space, and water-related and outdoor recreational uses within the West End. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.	Hotel / Motel (C); Short Term Rental, Commercial (P)	Hotel / Motel, Neighborhood (P), Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P)
52	**Article 15: Commercial Center & Institutional Campus Districts**	Commercial Center and Institutional Campus Districts represent the major destination areas within the city. They contain districts that address areas of commercial concentration and institutional campuses, and range from areas that are more pedestrian in orientation to those designed to accommodate significant parking demand. The types of commercial uses permitted within the Commercial Center and Institutional Campus Districts are based on a number of factors, including their proximity to residential areas, their location along major streets and the intensity of uses allowed within the districts. In addition to commercial districts that allow a variety of retail, personal service, office, and restaurant uses, specialized districts	C-1	The C-1 General Commercial District is intended to provide appropriate locations for a variety of commercial activities, generally serving a wide area and located particularly along commercial corridors with a mix of commercial, service, and residential activities. Areas of the C-1 District are oriented toward pedestrians but also accommodate larger commercial uses generally accessed by automobiles.	Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P)	Hostel (P); Hotel / Motel, Neighborhood (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P)
53			C-2	The C-2 Auto-Oriented Commercial District is intended for a wide variety of commercial activities, generally serving a wide area and located along major arterials. The C-2 District is intended for large-scale, auto-oriented commercial uses and strip commercial developments, which require significant parking. The C-2 District is also intended to accommodate marine-oriented commercial and recreational uses along major bodies of water.	Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P); Timeshare (C)	Hostel (P); Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Trem Rental, Commercial – Large (P); Timeshare (C)
54			C-3	The C-3 Heavy Commercial District is intended to provide for auto-oriented heavy commercial uses and large-scale shopping centers. Standards for the C-3 District are designed to maintain and enhance the appearance of these areas, and to provide adequate buffering between any residential and lower-intensity commercial properties adjacent to the district.	Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P)	Hostel (P); Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Trem Rental, Commercial – Large (P)
55			MU-1	The MU-1 Medium Intensity Mixed-Use District is intended to encourage walkable neighborhood centers and corridors, with a mix of residential and commercial uses. Buildings may contain vertical mixed-use as well as single purpose uses designed to provide transitions to adjacent lower density residential areas.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Hostel (P); Hotel / Motel (P), Short Term Rental, Commercial (P) Timeshare (C)	Hostel (P); Hotel / Motel, Neighborhood (C); Short Term Rental Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Timeshare (C)

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
56		for large-scale users are also destination centers, such as hospital and university campuses. Finally, in certain districts a mixed-use environment is permitted where higher density residential uses and vertical mixed-use is encouraged. Commercial Center and Institutional Campus Districts contain regulations that create and maintain intensive mixed employment, shopping, and entertainment destination environments. Controls within the districts address proper scales of development based on the desired intensity of the district, including regulations on parking, landscape, and screening.	MU-2	The MU-2 High Intensity Mixed-Use District is intended encourage walkable neighborhood centers and corridors conducive to transit, with a mix of residential and supportive commercial and office uses. Buildings may contain vertical mixed-use as well as single purpose uses designed to be located both at neighborhood centers and along major arterial corridors.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P)	Hostel (P); Hotel / Motel, Neighborhood (C); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P)
57			EC[3]	The EC Educational Campus District is intended for large university campus developments to facilitate an orderly and efficient regulation process for these types of uses. The district establishes a process that is flexible enough to accommodate evolving changes and expansions in campus plans, and creates the proper transitions between campus activities and adjacent neighborhoods. Within the district, development will proceed in accordance with an approved Institutional Master Plan that relates to the adjacent district, the surrounding neighborhoods, and needs of the universities.	Bed and Breakfast, Accessory (C); Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P)	Bed and Breakfast; Hostel (P); Hotel / Motel, Neighborhood (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P)
58			MC	The MC Medical Campus District is intended for medical campuses and the accompanying medical-related support services, including offices, research facilities and commercial uses, to facilitate an orderly and efficient regulation process for these types of uses. The district establishes a process that is flexible enough to accommodate evolving changes and expansion in medical campus plans, and creates the proper transitions between hospital activities and adjacent neighborhoods. Within the district, development will proceed in accordance with an approved Institutional Master Plan that relates to the adjacent district, the surrounding neighborhoods, and needs of the hospital.	Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P); Timeshare (C)	Bed and Breakfast (P); Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (C); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P); Timeshare (C)

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
59			MS	The MS Medical Service District is intended for local hospitals and medical service facilities of lower intensity than large medical campuses. The MS District is intended for hospitals, and hospital-related and support services that are generally integrated within and connected to adjacent areas of commercial and residential development.	Hotel / Motel (P); Short Term Rental, Commercial (P); Timeshare (C)	Bed and Breakfast (P); Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P); Timeshare (C)
60			LS	The LS Life Science Mixed-Use District is intended to provide a district that is focused on life sciences research, including research, development, medical and limited manufacturing activity. In addition to life science research and development uses, the area is also intended to be more mixed-use in nature, by also allowing higher density residential and supportive commercial uses to serve those that live and work within the district.	Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P); Timeshare (C)	Bed and Breakfast (P); Hostel (P); Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (C); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P); Timeshare (C)
61	**Article 16: Centers for Industry**	The Centers for Industry Districts contain an intensive mix of primarily non-residential uses. In most cases, the dominant character of these areas is that they are land extensive uses, such as office or industrial parks, industrial uses, and large research parks, both in campus developments and along designated corridors. Also, protection from encroachment of incompatible uses into the Centers for	LI	The LI Light Industrial District is intended to provide for a wide variety of light manufacturing, fabricating, processing, wholesale distributing and warehousing uses appropriately located near or adjacent to major thoroughfares or railroads for access. Commercial uses and open storage of materials are permitted. Light industrial uses are typically low-intensity, non-nuisance light fabrication and assembly-type manufacturing, as well as office and research and development (R&D) facilities.	Hotel / Motel (P); Short Term Rental, Commercial (P)	Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Medium (P), Short Term Rental, Commercial – Large (P)
62			HI	The HI Heavy Industrial District is intended to provide for industrial operations of all types with the appropriate design and development standards to assure protection of the public interest and surrounding property and persons. Heavy industrial uses are higher intensity manufacturing, warehouse, and storage uses. These manufacturing uses may produce moderate external effects such as smoke, noise, glare, or vibration.	Hotel / Motel (P); Short Term Rental, Commercial (P)	Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Medium (P), Short Term Rental, Commercial – Large (P)

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
63		Industry Districts is key to preserve important city assets such as port-related uses and active industrial areas. The Districts of the Centers for Industry contain regulations to create and maintain areas of major intensive employment and business operation destination environments. The Centers for Industry District can create significant impacts on surrounding uses, depending on the uses contained within, so proper site design, including auto storage and site circulation, landscape, and buffering, are key controls.	MI[2]	The MI Maritime Industrial District is intended to provide for water-related and maritime shipping-related industrial operations, in particular port operations. The MI District protects deepwater resources by limiting the types of industrial users allowed within the district. In addition, limited marine-oriented commercial and recreational uses are allowed within a sub-district of the MI District, subject to special design standards.	Hotel / Motel (P); Short Term Rental, Commercial (P)	Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Medium (P), Short Term Rental, Commercial – Large (P)
64			BIP	The BIP Business-Industrial Park District is intended to provide appropriate locations for certain types of business and light industrial facilities in well-designed and landscaped campus environments, and provide employment opportunities near residential areas. Supporting commercial uses are permitted, primarily for service to employees in the district. Typical development in the district would be that which is commonly known as an office and industrial park.	Hotel / Motel (P); Short Term Rental, Commercial (P); Timeshare (P)	Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P); Timeshare (P)
65	**Article 17: Central Business Districts**	New Orleans' Central Business Districts are characterized by a wide diversity of uses functioning within a single geography. These uses are mixed horizontally and vertically in a series	CBD-1	The CBD-1 Core Central Business District is intended for high-density, mixed-use development that accommodates a wide range of uses, including large office, financial, and commercial services uses that serve the local, regional, and national markets, as well as multi-family housing, retail, entertainment, hotel, government, and institutional uses.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P); Timeshare (P)	Hostel (P); Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P); Timeshare (P)

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
66		of buildings, arranged along a continuous streetwall. The Central Business Districts are designed to serve a diversity of functions within this same compact geography, including the community's civic center, a regional employment center, an international visitor center, and centers of service and learning. The zoning districts of the Central Business Districts contain regulations that create and maintain a focused destination that mixes employment, shopping, residential and entertainment activities in an intense, high density, primarily pedestrian environment.	CBD-2	The CBD-2 Historic Commercial and Mixed-Use District is intended to provide for the reuse of existing structures in historic districts and along prominent mixed-use corridors that frame the Central Business District. Buildings in the CBD-2 District provide small floor plates for office, retail, institutional, and residential uses that support the vitality of the Central Business District as a destination for residents and visitors. The CBD-2 District addresses unique corridors and historic districts within the Central Business District, including Convention Center Boulevard, the Picayune Place Historic District, and the central portion of Canal Street.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P); Timeshare (P)	Hostel (P); Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P); Timeshare (P)
67			CBD-3	The CBD-3 Cultural Arts District is intended to create a cultural and entertainment destination through the clustering of museum, cultural, performing arts, and supporting visitor services uses. The CBD-3 District is also intended to accommodate a mixture of residential, retail, and other commercial uses for residents and visitors. The CBD-3 District is specifically intended to address the music and theater corridor along and adjacent to the intersection of Basin, Rampart, and Canal Streets, and theaters and museum uses along Magazine Street and Howard Avenue.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P); Timeshare (P)	Hostel (P); Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P); Timeshare (P)
68			CBD-4	The CBD-4 Exposition District is intended for large destination uses and related services which generate high volumes of visitor traffic. The CBD-4 District addresses unique large-scale uses like the Superdome, Arena, and Convention Center.	Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P); Timeshare (P)	Hostel (P); Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P); Timeshare (P)

NO	BASE DISTRICTS AND PURPOSE STATEMENTS		ZONING SUB-DISTRICTS AND PURPOSE STATEMENTS		TRANSIENT LODGING USES	
					EXISTING	PROPOSED
69			CBD-5	The CBD-5 Urban Core Neighborhood Lower Intensity Mixed-Use District is intended to provide for a downtown neighborhood environment through a mix of housing types and supporting residential services and commercial uses conveniently situated with respect to employment opportunities. The CBD-5 District is intended to accommodate a lower concentration of certain commercial uses than the CBD-6 District, and is particularly suited for the area around Lafayette Square and surrounding areas.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Hotel / Motel (C); Short Term Rental, Commercial (P)	Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P)
70			CBD-6	The CBD-6 Urban Core Neighborhood Intensity Mixed-Use District is intended to provide for a downtown neighborhood environment with a mix of housing types, supporting residential services and commercial uses conveniently situated with respect to employment opportunities. The CBD-6 District is intended to accommodate a higher concentration of certain commercial uses than the CBD-5 District, and is particularly suited for the Warehouse District.	Bed and Breakfast, Accessory (C); Bed and Breakfast, Principal (C); Hotel / Motel (P); Short Term Rental, Commercial (P)	Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P)
71			CBD-7	The CBD-7 Bio-Science District is intended for large-scale bio-science campuses and supportive services. Standards for the CBD-7 District address the unique development of a large campus and its supportive services in order to create proper transitions from the campus to adjacent uses, as well as specific regulations for the core of the district.	Hostel (P); Hotel / Motel (P); Short Term Rental, Commercial (P); Timeshare (P)	Hostel (P); Hotel / Motel, Neighborhood (P); Hotel / Motel, Large (P); Short Term Rental, Commercial – Small (P); Short Term Rental, Commercial – Medium (P); Short Term Rental, Commercial – Large (P); Timeshare (P)

7.3 Other Recommendations

1. When and if new regulations are codified, several of these existing uses may become legally nonconforming. Those with licenses will be grandfathered under the former regulations. If no longer permitted in the base zoning district, Commercial Short Term Rental (S, M, and L) uses revert back to residential accommodations if the use is sold or the license is revoked or becomes expired; i.e. establish these uses as temporary consistent with Noncommercial Short-Term Rentals.
2. Continue existing platform data sharing, advertising, and reporting requirements, including requiring permit or license numbers to be listed online.
3. Do not require that each permit holder is a natural person, not a juridical person. The City of New Orleans has a Home Rule Charter, which means it can exercise powers not prohibited by

state law[1]. RS 12:1-128 states that "Anyone may apply to the secretary of state to furnish a certificate of existence and standing for a domestic corporation or a certificate of authorization and standing for a foreign corporation."[2] The CZO currently regulates that ownership of a Non-Commercial Short Term Rental by a juridical person is prohibited.[3] This does not currently apply to Commercial Short Term Rentals which could be considered a violation of the Dormant Commerce Clause, which prohibits localities from preventing intrastate commerce.[4] A recent court case, Hignell v. City of New Orleans,[5] challenged the residential Short Term Rental regulations based on this clause, and was not successful. The Court found that a resident operator requirement does not limit intrastate commerce, because it does not explicitly state where the permanent residence of the operator needs to reside. Further, the Court found that the natural persons requirement aligned with the City's focus on livability and quality of life in residential neighborhoods. However, since Commercial Short Term Rentals do not require a resident operator, and are not solely in residential neighborhoods, this could become problematic. Particularly when Bed and Breakfasts and Hotels and Motels do not have this same requirement.

4. Consider policies and programs described in **Section 5.4 – Additional Considerations** to take steps beyond land use regulatory policy updates to continue to advance housing affordability and access to long-term housing opportunities tied to the success and availability of transient lodging uses.

5. Maintain fees and penalties as is; focus efforts on supporting enforcement and increasing the severity of adjudication procedures, including more common license revocation.

6. Extend CTSR permit expiration time frames from 1- to 2-year renewals to shift more administrative time and effort towards enforcement processes.

7. Add new definitions to Article 26 in the CZO for bedroom, Sleeping Accommodations / Rooms, Transient Dwelling Unit, and Transient Lodging Use to support more consistent interpretation of the Code consistent with Appendix C.

7.4 Long Term Policy Recommendations and Next Steps to Consider

When and if: (1) proposed recommendations are implemented and (2) enforcement efforts are maintained, consider additional ways to support City revitalization goals and objectives, including additional placed-based regulations that may be appropriate in the city where economic activities are unlikely to impact community character, such as on Canal Street. To this effect, the City could consider the following policy tools in the future:

1. *Increasing the density maximums in specific zoning districts to allow for additional tourism and economic development opportunities.* The current density allows up to 3 CSTR-M uses on a block in the CBD1-7, EC, MC, MS, and LS districts, but this allowance could be increased to allow additional CSTR units, such as up to 4 or 5 uses on a block.
2. *Investigating specific commercial corridors in the short-, medium-, and long-term to spur or limit development via Overlay Zoning Districts.* Overlay Zoning Districts could be used to expand and/or limit transient lodging uses in specific areas of the City.
    a. The City of New Orleans allows the creation of Overlay Zoning Districts through a concurrent zoning text and map amendment.
    b. Overlay Districts have specific purpose statements outside of or addition to the base zoning districts and allow for or curtail specific uses and activities that may not be specified in the

base zoning district. For example, the Magazine Street Use Restriction Overlay District provides for the protection of historic uses and character along Magazine Street, while the Convention Center Neighborhood Overlay District promotes additional development near the Convention Center through height, bulk, and parking allowances.

c. Commercial corridors such as Oak Street, Canal Street, and/or Magazine Street may have room or need for additional transient lodging uses. Researching the needs and impacts for these corridors could result in the creation of Overlay Districts particular to transient lodging uses.

8. Additional Considerations

8.1 Transient Housing Incentives for Affordable and Workforce Housing

Transient lodging uses could potentially be used to incentivize development and preservation of affordable and workforce housing. First, it is important to understand the current taxes and fees garnered from STRs. **Table 7** outlines current taxes and fees in the City of New Orleans for STRs.

TABLE 7: CURRENT SHORT TERM RENTAL TAXES AND FEES

TAX TYPE	COST
RSTR Occupancy Fee	$5 per night rented
CTSR Occupancy Fee	$12 per night rented
City Sales Tax	5%
STR Equalization Occupancy Tax	6.75%
Occupancy Privilege	1-299 Rooms: $0.50 per night
	300+ Roome: $1.00 per night

The STR Equalization Occupancy Tax is distributed as per Sec. 150-1266 of the New Orleans Code of Ordinances[15], where:

- 75% of the proceeds shall be dedicated to the infrastructure and maintenance fund.
- 25% of the proceeds shall be allocated to New Orleans & Company pursuant to a multi-year cooperative endeavor agreement approved by the City Council and used to promote tourism in the City.

Portions of both CSTR and NSTR Occupancy fees are allocated to the Neighborhood Housing Improvement Fund (NHIF).[16] In 2023, the City Council approved additional funding for the NHIF to

[15] New Orleans, Louisiana Code of Ordinances. (2020, September 1). *Chapter 150 – Taxation*. Article XIV. Short Term Rentals Occupancy Tax.
https://library.municode.com/la/new_orleans/codes/code_of_ordinances?nodeId=PTIICO_CH150TA_ARTXIVSHTEREOCTA_S150-1270PERI

[16] New Orleans, Louisiana Code of Ordinances. (1991, June 20). *Chapter 70 – Finance*. Article III. Funds.
https://library.municode.com/la/new_orleans/codes/code_of_ordinances/242810?nodeId=PTIICO_CH70FI_ARTIIIFU_DIV17NEHOIMFU

be used to build up to 1,000 affordable housing units over the next year, with about 1,500 units in various stages of development across the City.[17] However, New Orleans has fewer housing units per capita than what exists across the country, and would need an additional 40,000 units to meet the national rate.[18] Residents voted for this fund to become part of the City Charter, but budget dedication will not go into effect until 2026, when the City will have a new Mayor and Council.

As mentioned above, the Mandatory Inclusionary Zoning (MIZ) market analysis found that affordable housing units are difficult to create in the current market due to rising development costs and insurance rates, and even lowering the current MIZ requirements would do little to provide for low-income renters in the City. To be successful, the NHIF would have to take these considerations into account.

The Tax Year 2024 Quadrennial Reappraisal Report performed by the Orleans Parish Assessor states that the Louisiana Tax Commission (LTC) does not currently require assessors to account for properties with STR permits, and the Organization of Parish Administrative Officials (OPAO) does not value properties with STR permits higher than those without such permits. In 2023, LTC issues a statewide advisory seeking proposals and recommendations for rulemaking on this topic, specifically whether or not to count all STRs as commercial property. If all STRs were to be categorized as commercial property, the recommendations that follow in this Section could be made as they pertain to both CSTR and NSTR.[19] This proposal is still under development.

8.2 Allocation of STR Tax and Fee Revenue

The City of Aspen has approved taxes for nightly accommodation stays within the City limits. For collections generated by the STR tax, 70% of receipts go towards affordable housing efforts, and the remainder of the funds goes towards environmental initiatives and capital repair and maintenance needs[20]. **Table 8** includes a breakdown of City of Aspen's STR tax structure:

TABLE 8: CITY OF ASPEN SHORT TERM RENTAL TAXES

VOTER APPROVED TAX	COUNCIL ORDINANCE
1.00% Lodging Tax - Tourism Promotion (100%)	Ordinance 45-2000
1.00% Lodging Tax - Tourism Promotion (50%) / Transportation (50%)	Ordinance 31-2010

[17] Myers, B. (2023, May 26). *Bureau of Governmental Research.* New Orleans Affordable Housing Development Fund Aims to Close Widening Financial Gaps. https://www.bgr.org/new-orleans-affordable-housing-development-fund-aims-to-close-widening-financing-gaps/

[18] Myers, B. (2023, May 26). *Bureau of Governmental Research.* New Orleans Affordable Housing Development Fund Aims to Close Widening Financial Gaps. https://www.bgr.org/new-orleans-affordable-housing-development-fund-aims-to-close-widening-financing-gaps/

[19] Louisiana Legislative Auditor. (2023, December 22). *Tax Year 2024 Quadrennial Reappraisal: Orleans Parish Assessor*. Informational Report. https://app2.lla.state.la.us/publicreports.nsf/0/f74bf8c6ffebdf7f86258a8d00657f6c/$file/000037d0b.pdf?openelement&.7773098

[20] City of Aspen. (2025). *Finance and Purchasing*. Lodging and Short Term Rental Taxes. https://www.aspen.gov/1427/Lodging-and-Short-Term-Rental-Taxes

5.00% Short-Term Rental Tax (Owner-Occupied or Lodge-Exempt Permitted Properties)*	Resolution 106-2022
10.00% Short-Term Rental Tax (Investment / 2nd Homeowner "Classic" Permitted Properties)*	Resolution 106-2022

The City of New Orleans has an STR Equalization Occupancy fee, but it goes towards mainly infrastructure and tourism funding. A policy that restructures how the taxes are allocated could allow for the furtherance of affordable housing in the City.

8.3 Housing Trust

In 2013, the City of Nashville created Metro Nashville's first housing trust fund, the Barnes Fund, to leverage affordable housing developments throughout Davidson County. In 2015, the City of Nashville passed legislation requiring 1% of Short Term Rental property occupancy taxes in Nashville to go towards the Barnes Fund, a housing trust fund that leverages affordable housing developments in Davidson County. Since its inception, the Barnes fund has invested more than $108 million in affordable housing development and preservation, and has constructed more than 4,700 housing units.[21]

The City of New Orleans has the opportunity to do something similar to this, as the NHIF has been established and become part of the City Charter. The City also has a Housing Trust Fund that could leverage affordable housing developments. Further analysis will need to be done once the new administration takes over in 2026, and budget can be allocated to the fund.

8.4 Inclusionary Zoning Incentives

In 2019, the City of New Orleans released the New Orleans Short Term Rental Affordable Housing Study, in which it proposed utilizing CSTR as an Inclusionary Zoning (IZ) tool.[22] This action remains unprecedented, so no other examples exist thus far. The 2019 Study suggests that CSTR developers could utilize an STR permit incentive by agreeing to build one affordable housing unit per every six STRs (IZ currently requires 10% of affordable housing units for housing developments with over ten units[23]). This would allow for clear enforcement, as it could be aligned with the enforcement of MIZ policy. For CSTRs not in a MIZ district, there could be a policy that requires a certain number of units to be affordable housing if CSTR uses are permitted in that district.

8.5 PILOT Program.

The Payment-in-Lieu-of Taxes (PILOT) program currently allows developers to receive tax relief (through frozen property taxes) if they provide affordable housing within the Mandatory Inclusionary

[21] Metropolitan Government of Nashville & Davidson County. (2025). *Mayor*. Barnes Housing Trust Fund. https://www.nashville.gov/departments/mayor/housing/barnes-fund
[22] HRA and UrbanFocus. (2019, July). *New Orleans Short Term Rental Affordable Housing Study*. Using STRs to Support Affordable Housing. https://www.nola.gov/nola/media/City-Planning/HRA_New-Orleans-Short-Term-Rental-Housing-Study-FINAL-8-1-19.pdf
[23] City Planning Commission. (2019, September 5). *New Orleans Comprehensive Zoning Ordinance*. Article 28: Mandatory Inclusionary Sub-Districts. https://czo.nola.gov/article-28/

Zoning (MIZ) zones. There are two ways in which this policy could be modified to include STR incentives:

- New developments in commercial zones that combine CSTR and affordable housing units could be eligible for longer PILOT terms.
- Extend PILOT benefits only to CSTR projects that integrate affordable housing.

If this mechanism were to extend to include CSTRs, operators benefiting from PILOT incentives could be required to dedicate a portion of units to long-term workforce housing or pay a fee that supports affordable housing initiatives. This could be applied to the above proposal to receive PILOT benefits only if a percentage of the property is reserved for affordable long-term rentals.

Extending benefits from the Restoration Tax Abatement (RTA) program could also potentially incentivize CSTR development, while reducing blight in the City. The RTA program "Provides commercial property owners and homeowners who expand, restore, improve, or develop and existing structure in a downtown development district, economic development district, or historic district the right to pay ad valorem taxes based on the assessed valuation of the property for the year prior to commencement of the project for five years after completion of the work." [24] When combined, building in the need for substantial improvement, while also locating in IZ districts, could allow for both the incentives of CSTR permits and ad valorem taxes.

In addition to this idea, developers who include affordable or workforce housing units in CSTR developments could receive one or more of the following as incentives:

- Waivers or reductions in CSTR/STR taxes.
- Increased density allowances.
- Subsidies from the NHIF or similar housing fund that leverages STR fees.
    - Rental assistance programs targeting workforce housing needs.
    - Grants or low-interest loans for developers to build or maintain affordable housing.

8.6 Payment In-Lieu

The Bureau of Land Management currently has policies in place for the use of payment in-lieu, which can be used when on-site options are not feasible. Payment in-lieu consists of compensating for resource impacts by replacing or providing substitute resources or habitat at a different location than the project area. [25] This same principle could be applied to CSTRs. For example, if a CSTR owner does not want to include affordable housing units, they could be required to contribute an additional fee to the NHIF or similar fund in order to provide affordable housing units, separately from the CSTR. These fees could be tiered, and CSTR operators that do not wish to include affordable housing units could pay higher fees unless they choose to dedicate units to affordable/workforce housing.

Napa, California, implemented a similar payment in-lieu policy. In 1992, the Affordable Housing Fund (AHF) was established to ensure the development and preservation of affordable housing for very low, low, and moderate income Napa County residents. To provide funding to the AHF, the City of Napa

[24] City of New Orleans. (2025). *Economic Development Programs.* Restoration Tax Abatement (RTA) Program. https://nola.gov/next/economic-development/programs/restoration-tax-abatement-(rta)-program/
[25] Bureau of Land Management (2025). *Mitigation*. https://www.blm.gov/policy/im-2008-204

adopted an Inclusionary Housing ordinance that required payment of an impact fee (now an affordable housing impact fee) on most non-residential or commercial development.[26] The AHF works by offsetting the impact of new residential and nonresidential development on existing housing resources and provides a means for developers to pay for their fair share of affordable housing.

The City could implement any of the above additional considerations, in addition to the main recommendations and long-term policy recommendations, in the future to increase revenue in general as well as revenue towards affordable housing. These recommendations could be applied individually or as a group as additional revenue or funding is needed.

[26] City of Napa. (2025). *Housing Division*. Affordable Housing Development. https://www.cityofnapa.org/179/Affordable-Housing-Development

APPENDIX A

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1. Background

1.1 Rise in Rentals, Generally

Transient lodging uses are a continually evolving land use. These uses include Bed and Breakfasts, Hotels, and Motels which provide travelers with places to stay outside of the home. Inns and Rooming Houses have been available to travelers for centuries, and hotels became prominent in the 19th Century with the advent of the railroad. Motels became popular in the 1920s and 1930s with the increased use of the automobile. In more recent history, websites and mobile applications have helped facilitate additional transient lodging uses. Platforms like Vacation Rentals By Owner (VRBO), created in 1995, target users looking for whole home or unit vacation rentals outside of the traditional hotel space. Other platforms such as CouchSurfing, founded in 2004, allow travelers to stay in residents' homes worldwide. Short Term Rentals, or STRs, rose in popularity with the establishment of Airbnb[1] in 2009, which allowed anyone to rent rooms or whole homes to visitors. The creation of Airbnb's mobile app in 2014, as well as subsequent competing platforms providing similar services, increased rental land use activity in both residential and commercial settings, outpacing most municipalities' ability to fully understand and adapt local zoning regulations to address these emerging land uses and impacts in real time. STRs differ from other transient lodging uses in that they can be operated by a resident or a company, and many municipalities lack regulatory frameworks for monitoring and permitting them as transient lodging uses. STRs popularity decreased as a result of the 2020 pandemic but became a significant part of many local economies' recovery in the years following, including the City of New Orleans. These land use activities have resulted in both positive and negative impacts to the built environment and community character.

1.2. Rise in Rentals in New Orleans, Generally

In New Orleans, STRs emerged and operated outside the land use standards that apply to traditional transient lodging uses such as hotels, motels, bed and breakfasts. Initially marketed as a way to share underused residential space, STRs quickly evolved into a form of commercial lodging – often indistinguishable from smaller hotels and bed and breakfasts in both appearance and function.

As STR uses expanded, the City developed regulations to address this new and evolving land use, often reacting to public pressure. The result was several iterations of STR regulations, and numerous Overlay and Interim Zoning Districts that created a complex regulatory scheme. This piecemeal approach has produced a fragmented regulatory landscape, where transient lodging uses are governed by separate rules despite similar land use impacts and activities.

This misalignment has complicated enforcement, blurred the line between similar transient lodging land uses, and raised questions about how the CZO should distinguish between and regulate different types of transient lodging uses.

1.3 Previous Studies

The City of New Orleans completed a 2016 Rental Study, followed by two later editions in 2018 and 2019, which documented both positive and negative impacts to the built environment and community character thoroughly.

This Study aims to build from data and findings of previous studies, as well as provide a long-term, comprehensive analysis made possible because STRs have been in operation for more than 10 years. It is also important to note that previous studies focused on all types of STRs – residential and commercial

[1] "Airbnb" refers to a website that is a platform enabling STR owners to rent their units to potential customers. It is one of multiple platforms that function in this manner. See https://www.airbnb.com/ for more information.

(or non-residential), and resulting text amendments have re-instated and amended the regulations for both types of rentals. Recently, there was an overhaul of Non-Commercial Short Term Rental (NSTR) regulations, but the City Council felt a study was needed to update the Commercial Short Term Rental (CSTR) regulations including an analysis of all transient lodging uses (with the exception of NSTRs) comprehensively. For the purposes of this Study, Commercial Short Term Rentals, or CSTRs, are defined as occupied units leased for less than 30 days by any agent for income. Non-Commercial Short Term Rentals, or NSTRs, are defined as operator-occupied units leased for less than 30 days by any agent for income. When the Study refers to STRs, it means both NSTRs and CSTRs.

1.4 Conflicting Interests: Homeownership & Tourism

When STRs initially became a form of transient lodging and property owners developed units across the nation, many STR operators and prospective operators in New Orleans believed that this land use activity could create unique, income-generating opportunities for locals to build wealth and reduce poverty. Since then, the City Council and Administrations have learned there can be unforeseen outcomes of permitting an STR in a residential neighborhood, and these outcomes can include disruption to local community character. The City Council and Administration take the potential negative impacts of STRs in residential neighborhoods seriously and maintains this consideration at the heart of this study.

Specific Example: The Browns Dairy Development

The Browns Dairy Development revealed the unintended impacts of underregulated CSTRs in the City. Located in Central City and abutting the Garden District, this development was designed to create affordable homeownership opportunities through reduced lot sizes, parking, and setbacks. This followed the guiding principles in the City's Master Plan, which highlighted the site as an opportunity for affordable housing and commercial investment. However, after the subdivision was approved, a new developer purchased the land and changed the proposal to provide only CSTR units in direct conflict with the City's Master Plan and in conflict with the initial project goal to support homeownership. The developer was able to do this because the area was zoned High Intensity Mixed-Use (MU-2) and there were no density restrictions for CSTRs. This resulted in the City Council creating a new Overlay District, the Browns Dairy Overlay District, which limits the creation of more CSTRs in favor of protecting the historic neighborhood character.

This development scenario represents a core STR (including CSTR) challenge that is at the heart of this Study, where STRs (unintentionally or intentionally) trend towards limiting long-term homeownership opportunities in favor of supporting a growing tourism industry.

1.5 Current Interim Zoning District (IZD) Regulations in Effect

The citywide Commercial Rental Interim Zoning District (IZD) was enacted by Ord. 29701 on November 7, 2023, and extended by Ord. 30130 on November 7, 2024. It prohibited new CSTRs until May 7, 2025, and was extended again by Ord. 30292 to November 4, 2025. This prohibition supported the completion of this Study of Transient Lodging Uses, including a review of CSTRs in New Orleans, as well as their impact on the built environment, local economy, and housing market.

1.6 Background & Data Analysis Scope and Purpose

This **Appendix** represents the first step toward the development of policy recommendations for CSTRs and related uses and was followed by the incorporation of feedback and input from stakeholders, neighborhoods, and community-wide outreach and engagement efforts. It summarizes the regulatory history of STRs in the City, describes the number and location of CSTRs, explores the CSTR Market

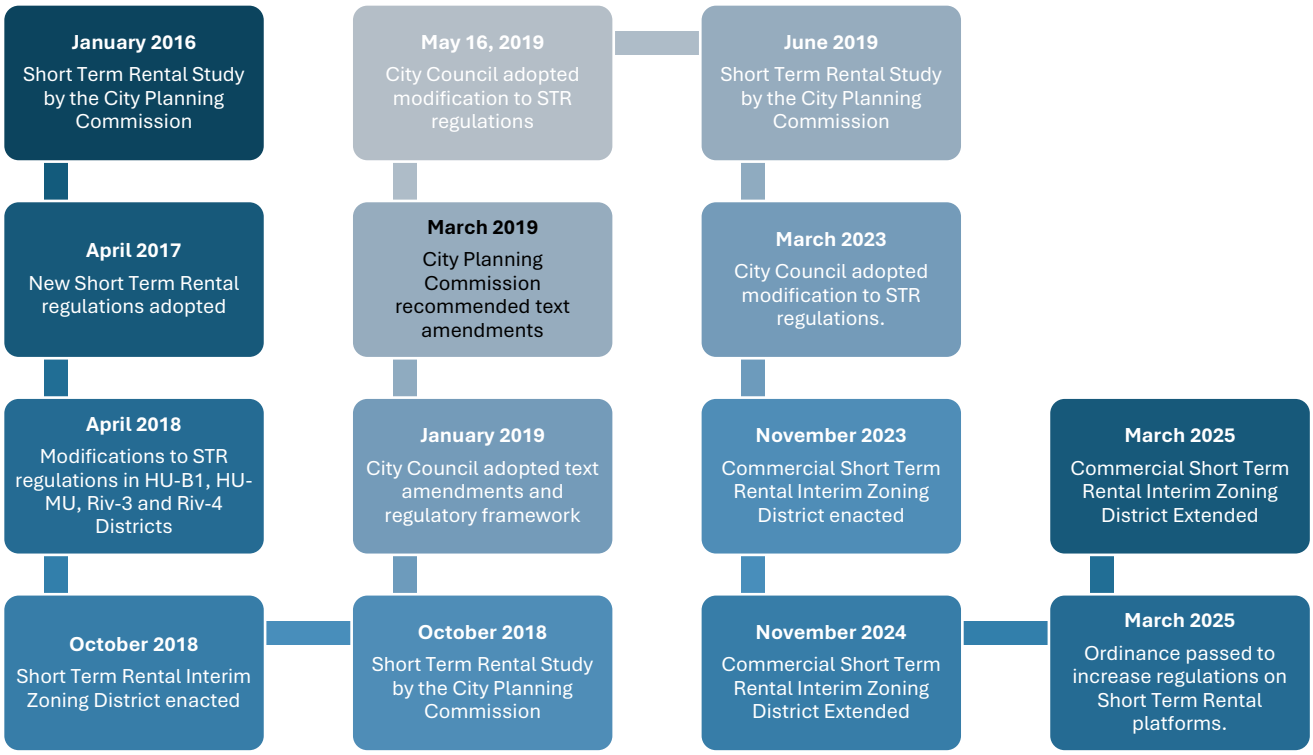
and its impact on housing, provides a comparison to STRs in other cities, and presents initial findings on the impact of CSTRs in the City.

It supports the completion of a **Transient Lodging Study Final Report,** which is: 1) based on core, tried and true planning principles; 2) built on previous studies; and 3) identifies, defines, and proposes locations for CSTRs.

1.7 Regulatory Timeline: The City Moves Toward Stricter STR Regulation

Figure 1 illustrates the regulatory history of STRs within the City, with a focus on previous studies beginning in 2016, as well as the subsequent regulations enacted following each Study. Overall, each Study has (1) included public input, (2) accounted for impacts to economic development, and (3) resulted in stricter regulation of STRs. The existing CSTR Interim Zoning District regulations are further evidence of this effect (i.e. placing a moratorium on new CSTR permits during this Study).

FIGURE 1: REGULATORY TIMELINE FOR SHORT TERM RENTALS



1.8 Previous Study Goals, Objectives, and Priorities

The City Planning Commission's studies aimed to better understand the role STRs play in the local housing economy and to develop appropriate regulations to adequately address them. The 2016 Rental

Study[2], and subsequent studies in 2018[3] and 2019[4], all included goals and objectives, public input, and key findings that indicated both positive and negative impacts of STRs in the community, and recommendations for improvements. This Study aims to build from this data and provide a longer-term, comprehensive analysis made possible because STRs have been in operation for more than 10 years.

Table 1 includes this information in summary, followed by a brief description of key take-a-ways.

TABLE 1: PREVIOUS STUDIES GOALS, OBJECTIVES, INPUTS, KEY FINDINGS, AND RECOMMENDATIONS

	2016 STR STUDY	2018 EDITION	2019 EDITION
Goals and Objectives	• Ensure safety of visitors • Protect neighborhood character • Enable economic activities • Create equitable regulations • Generate revenue • Facilitate public information • Allow STRs based on impact • Propose regulations for each STR type • Propose enforceable regulations • System where problem operators would not vest property rights	• Determine if amendments are necessary • Reduce impacts on neighborhood fabric • Ensure platform accountability • Amend categories and definitions • Make revisions to zoning categories • Update fee structure • Create remedies to illegal STRs • Adopt use of parcels in permitting • Modify Commercial STR regulations • Enforce new prohibitions	• Creation of an Economic Development Incentive STR Zone • Cap on number of Residential STR permits • "Grandfather" provision for existing or prior Commercial license holders
Public Input ***(Positive disposition toward STRs)***	• Part of economy • Provide additional income • Income from taxes and fees • Reduce blight and support local businesses	• Create additional income • Spur redevelopment and economic development	• Contribute to economic development • Expand tourist center • Provide additional income

[2] Kindel, Nicolas, et al. (2016). *Rental Study*. City Planning Commission, City of New Orleans. https://nola.gov/next/city-planning/topics/major-studies-projects/2015-short-term-rental-study/.
[3] Perry, Brooke, et al. (2018). *Rental Study, 2018 Edition.* City Planning Commission, City of New Orleans. https://nola.gov/next/city-planning/topics/major-studies-projects/2018-short-term-rental-study/.
[4] Cramer, Paul et al. (2019). *Rental Study, 2019 Edition*. City Planning Commission, City of New Orleans. https://nola.gov/next/city-planning/topics/major-studies-projects/2019-short-term-rental-study/.

	2016 STR STUDY	2018 EDITION	2019 EDITION
Public Input ***(Negative disposition toward STRs)***	• Reduce neighborhood quality of life, long term residents, and affordable housing units • Competitive advantage over other businesses	• Diminish housing stock • Impact quality of life • Only residential STRs are a problem • Out-of-City owners are the issue • Commercial STRs taking over commercial corridors and entire buildings	• Detrimental to neighborhood development • Negative impacts on neighborhood culture and long-term rental market • Displacement of most vulnerable communities
Key Findings	• Between 2,400 and 4,000 listings (70% whole unit rentals) • Concentrated in historic core neighborhoods • Need for stricter building code regulations • Need to categorize STRs into types • Consider permitting in commercial and mixed-use districts • Need for new license type • Need for increased Platform cooperation • Need to revise state law for sales tax	• 4,210 active licenses as of 5/23/18 (23% Commercial) • 51.1% within Historic Urban Neighborhoods Residential District, 14.8% located within Historic Core Neighborhoods Residential Districts • Code Enforcement does not have time or resources to pursue violations • Only Airbnb and Expedia provide information	• Number of STR permits changed significantly since implementation of STR Interim Zoning District (IZD) • Temporary STR permits prohibited by the IZD fell 87% • Commercial STRs increased 21%
Recommendations	• Allow Commercial Rentals in most commercial and mixed-use districts • Modify Bed and Breakfast regulations to reduce number of bedrooms and allow Accessory Bed and Breakfasts in residential neighborhoods	• Eliminate Principal Residential Rental Type • Eliminate STRs in the French Quarter (except for VCE district) • Place a "soft cap" on Commercial STRs in the HU-B1 and HU-MU Districts, only permit two rentals per property, any more require a conditional use permit	• Potential to revitalize commercial corridors through blight remediation and economic development • Encourage Commercial STRs in Arts and Cultural Overlay Districts and other districts in need of revitalization • Remove 25% cap in areas in need of revitalization • Predicate issuance of licenses on provision of affordable permanent housing

In summary, the studies found that STRs spurred economic development but also positively and negatively impacted residential neighborhoods. There have been fluctuations in the number and type of STRs in response to changing regulatory frameworks. For example, between the 2016 and 2018 study,

the number of STRs increased, then residential STRs decreased because of the 2019 Interim Zoning District (IZD), while CSTRs increased.

The studies completed by the City Planning Commission resulted in recommended regulations. However, subsequent text amendments to the Comprehensive Zoning Ordinance were required to codify the new regulations.

Following the 2016 Study, the City Council approved Ordinance No. 27209, which adopted regulations pertaining to rentals for the first time. The Ordinance amended enforcement and penalties, amended permitted use tables for Bed and Breakfasts and created new uses for rentals. The first iteration of the STR regulations resulted in three STR uses, Commercial Rentals, Temporary Rentals, and Accessory Rentals, and created land use standards for these uses. The Ordinance also modified Bed and Breakfast land use standards, amended off-street parking requirements for Bed and Breakfasts, created off-street parking requirements for Commercial Rentals, and edited the definitions for Bed and Breakfasts.

Following the 2018 Study, the City Council passed Ordinance No. 28156 to incorporate recommendations from the 2018 Edition. The ordinance amended the permitted and prohibited zones for Bed and Breakfasts, Hostels, Hotels and Motels, and Commercial and Residential Rentals, updated land use standards for Bed and Breakfasts, Commercial and Residential Rentals, amended off-street parking requirements for Bed and Breakfasts, Hotels and Motels, and Commercial and Non-Commercial Rentals, and updated the definitions for Bed and Breakfasts, Customary Lodging Services, Guest Bedroom, Party of Guests, and Commercial and Residential Rentals.

In 2023, the City Council adopted Ordinance No. 29382 to remove the homestead exemption regulation from Residential Rentals to comply with a decision made by the United States Court of Appeals for the Fifth Circuit. The ordinance also amended the regulations for Bed and Breakfasts to require conditional use approval for both Accessory and Principal Bed and Breakfasts in all zoning districts where they were permitted and updated the use standards to allow one Bed and Breakfast or Non-Commercial Rental per city block. The ordinance further updated operational requirements for Non-Commercial Rentals and updated the definitions for Bed and Breakfasts and Non-Commercial Rentals to require operator occupation.

With each Study, there has been a tightening of regulations in response to an evolving market, and this trend continues today. In 2025, the City Council adopted Ordinance No. 30300 to increase regulations on rental platforms. This included requiring a City permit, hosting information that matches the City permit, holding general liability insurance, legal verification of the listing, and providing a monthly report to the City.

All three studies document a steady evolution in the City's regulatory approach to transient lodging uses. This Study continues this process with an improved transient lodging use policy framework that manages land use activities in commercial and mixed-use areas, fosters positive impacts, and mitigates negative impacts.

2. Data Collection and Analysis

2.1 Generally

This section includes an examination of the best available data (refer to **Section 2.2** for more information on Study data limitations) relevant to transient lodging uses in the City, including the total number today, history of permit data, and code enforcement data. Generally, transient lodging uses have always existed in the City, but STRs grew in popularity over the last 10 years, with a noticeable spike in popularity between 2017-2019, followed by a decrease in activity during the pandemic and as a

result of changing regulations. In reviewing all data, STRs are the largest share of existing transient lodging use permit holders. How they are regulated in the future will have a significant impact on the City's character and its economy.

2.2 Data Sources and Data Limitations

This Appendix reflects research from multiple data sources used to explore transient lodging uses and their impacts. The data utilized include City, State, and federal data sources, with academic and third-party data sources used only if additional information was needed to explain or expand on certain facts, numbers, forecasts, or predictions.

The City data sources include findings from the three previous Short Term Rental Studies from 2016, 2018, and 2019 completed by the City Planning Commission; permit data from the City of New Orleans Department of Safety and Permits; tourism data from New Orleans and Company; regulatory information from the New Orleans Comprehensive Zoning Ordinance; and legislative information from the New Orleans City Council. The State data sources consist of tourism data from the Department of Culture, Recreation, and Tourism, tax collection information from the Louisiana Department of Revenue, and legislative information from the Louisiana State Legislature. The federal data sources include employment and industry data from the United States Census Bureau and the United States Bureau of Labor Statistics.

The academic data sources consist of eviction data from Princeton University, tourism and employment data from The University of New Orleans Hospitality Research Center, and Mardi Gras tourism information from Tulane University. The third-party data sources include listings data from Airbnb and Granicus; tourism data from Road Genuis, Fox 8, Where Y'at Magazine, the New Orleans Saints, the Hilton Foundation, and Tourism Economics; market analysis data from the Reinvestment Fund; statistical data from The Data Center; and STR data from the Jane Place Neighborhood Sustainability Initiative.

Over the last 10 years, NSTRs and CSTRs have not been included within comprehensive national datasets (i.e.; Census, NAICS, or LBCS) as a unique land use activity or industry sector (or subsector). Because these datasets do not differentiate the uses and activities from other transient lodging activities, the statistics specific to CSTRs or NSTRs are not tracked and reported consistently. Instead, they are grouped within broader travel accommodation datasets that include uses and industries for traditional Bed and Breakfasts and Hotels / Motels. This filters down into regional and local datasets. For example, when assessing citywide data on housing occupancy, STRs are grouped within a "vacant" occupancy category that includes a subcategory related to transient lodging that includes Bed and Breakfasts, etc. For this reason, much of the data and findings included in this Study do not create clear causal relationships between NSTRs (and CSTRs) and community impacts assessed. The City also has limited consistent, reliable data on CSTRs and NSTRs. For example, in December 2019, the City experienced a cyber-attack, which impacted some of the permit data. And, in 2023, the City had to pause STR licensing due to a lawsuit.

The conditions of existing data made focusing analysis on CSTRs as part of this Study challenging, but not impossible. To overcome this challenge, this Study utilizes the best available data to address study research questions and directly acknowledges the shortcoming of data with less conclusive findings. In addition to data limitations, there are significant outside factors that must be accounted for when reviewing the best available data, which also significantly impact the Study findings. Specifically, federal policies during the pandemic, such as moratoria on evictions and rental subsidies; missing permit data due to unforeseen data losses in 2019; and changing City STR regulations taking effect during the

course of the Study create data fluctuations that are not market driven, but policy driven. Additionally, much of the data looks at STR impacts broadly, without differentiating between CSTRs and NSTRs. The Project Team strived to account for the normalization of datasets pre- and post-pandemic, as well as fluctuations in data in response to waves of new STR regulations taking effect over the last 10 years.

The Project Team met with stakeholders and formed a Working Group comprised of internal city experts to examine these fluctuations in data, collect additional qualitative datasets from a citywide Community Survey, and fill data gaps, in order to make comprehensive, informed, and carefully considered Study recommendations. Only findings based on conclusive data and analysis informed the basis of policy recommendations.

2.3 Total Transient Lodging Uses Today

As of March 2025, there were a total of 2,824 transient lodging uses permitted or licensed in the city. STRs make up 88.2% of these uses (of which CSTRs make up 40.2%), Hotels and Motels 7.9%, and Bed and Breakfasts 3.9%.

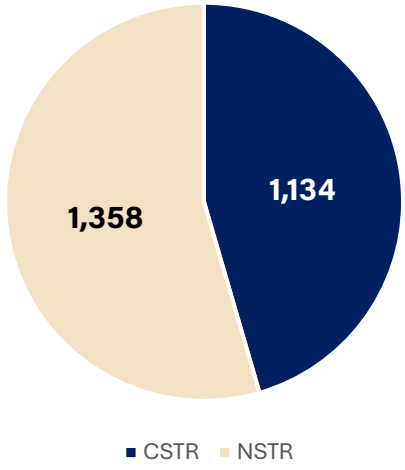
TABLE 2: TRANSIENT LODGING USE PERMITS AND OCCUPATIONAL LICENSES[5]

TRANSIENT LODGING USE TYPE	TOTAL LICENSES	%
Bed & Breakfast – 1-2 Rooms	11	0.4%
Bed & Breakfast – 3-5 Rooms	5	0.2%
Bed & Breakfast Inns	93	3.3%
Total Bed & Breakfasts	**109**	**3.9%**
Hotels & Motels	220	7.8%
Traveler Accommodation	3	0.1%
Total Hotels and Traveler Accommodation	**223**	**7.9%**
Total NSTRS	1,358	48.1%
Total CSTRs	1,134	40.2%
Total STRs	**2,492**	**88.2%**
Total All Transient Lodging Uses	**2,824**	

Of the total 2, 492 current 2025 licensed or permitted STRs in the City, 40.2% (1,134) are CSTRs and 48.1% (1,358) are NSTRs (**Figure 2**).

[5] Note: These totals were sourced from the Short Term Rental Administration's permit records. The Bureau of Revenue also tracks Occupational Licenses using a different method and different categories.

FIGURE 2: FEBRUARY 2025 TOTAL STRS



The current STR license numbers are in the thousands, but if the permits are broken down by building address, the numbers are reduced, indicating there are several buildings containing more than one CSTR. **Table 3** further breaks down the type of current CSTR and NSTR by building in the City as of February 2025. However, the numbers are still higher than the other transient lodging uses. It is also important to note that these numbers do not include illegally operating STRs. **Section 2.5** describes these illegally operating units in more detail.

TABLE 3: CURRENT STRS BY BUILDING

CURRENT LICENSE TYPE	NUMBER
Commercial STR (CSTR)	788
Residential STR (NSTR)	1,358
TOTAL	2,145

Who holds STR licenses, how many, and how are they manifesting in the City's building stock? All NSTR (or residential) licenses are issued to individuals or trusts. On the other hand, many of the current CSTR licenses are owned by companies, trusts, or Limited Liability Companies (LLCs) with multiple listings.

Specifically, of the 1,134 current CSTR licenses, 811 (72%) are owned by companies, trusts, or LLCs. A total of 640 (56%) of the listings are from companies that hold two or more licenses. In total, 143 companies have 2 or more licenses, and 14 companies have 10 or more licenses. The companies with multiple licenses often have units in the same building or neighboring buildings.

A total of 8 buildings in the City have 10 or more listings: 1041 Constance Street, 451 Girod Street, 722 Girod Street, 2228 Gravier Street, 212 Magazine Street, 1429 North Claiborne Avenue, 800 St. Charles Avenue, and 711 South Peters Street.

Concentrations of CSTR licenses that are held in single ownership and are located within and across multiple buildings create a significant land use impact on neighboring properties and neighborhood character. This unique situation is discussed in more detail as part of stakeholder interviews and community survey findings (**Appendix B**) and suggests additional density and occupancy land use standards are needed to limit this land development pattern from continuing in the future.

2.4 Transient Lodging Use 10-Year Permit History

The City of New Orleans has tracked permit data for transient lodging uses for many years. However, STR data is only available beginning in 2017. This section explores permit trends from 2017 to the Present.

TABLE 4: BED & BREAKFAST, AND HOTEL & MOTEL PERMITS

DATE	Bed & Breakfasts	Hotels & Motels
2017 & Prior	68	142
2018	10	16
2019	6	22
2020	-	18
2021	8	28
2022	6	11
2023	13	16
2024	2	14
Total	**113**	**267**

As of 2024, 267 Hotels and Motels, 113 Bed and Breakfasts, and 11 Boarding and Rooming Houses have been permitted. However, 220 Hotels and Motels, 109 Bed and Breakfasts, and 11 Rooming Houses are currently licensed in the City. Rooming Houses are currently operating as nonconforming uses. The difference between the number of permits and the number of licenses could indicate that up to 47 Hotels and Motels and up to 4 Bed and Breakfasts could have closed or altered their use, perhaps to STRs or CSTRs.

When considering STR permits issued (both CSTR and NSTR), it is important to note that current STR licensed units require annual permit renewals. To better understand how the City has 2,492 active STR licenses today, **Table 5** lists the number of STR permits applied for and issued in the City from 2017 to 2025, and **Table 6** further breaks down the number of CSTR permits issued in the same timeframe.

TABLE 5: STR APPLICATIONS AND PERMITS 2017-2025[6]

DATE	NUMBER OF APPLICATIONS	NUMBER OF ISSUED PERMITS
2017	3,758	3,670
2018	3,664	3,573
2019	3,590	3,436
2020	1,457	220
2021	2,534	1,533
2022	3,329	2,159
2023	3,523	1,480
2024	1,906	1,357
2025	242	203

Thousands of Commercial and Non-Commercial Rental permits were issued from 2017-2019. This initial period was followed by a dramatic decrease (220 total in 2020) likely impacted by the COVID-19 pandemic. The last few years included a rise in 2021, followed by a rise to almost 2017-2019 levels in 2022 and 2023, then a small decline in 2024. Section 2.5 details more information about STRs operating without City permits.

When comparing the number of applications submitted for STRs to the number of permits issued, it is clear that not all STR applications result in a STR permit. This could be due to a number of factors, including applications expiring, missing information, or not meeting minimum STR requirements.

TABLE 6: CSTR PERMITS 2017-2025[7]

DATE	COMMERCIAL SHORT TERM RENTAL PERMITS
2017	619
2018	1,046
2019	1,524[8]
2020	96
2021	906
2022	1,107[9]
2023	797
2024	1,051
2025	101

[6] City of New Orleans Rental data
[7] Ibid.
[8] This number may be inaccurate, as a cyber attack in 2019 resulted in the use of paper applications until it was resolved.
[9] A lawsuit in 2022 paused licensing for many months, so this number is lower than it may have been.

When reviewing CSTR permits issued from 2017 to 2021 (**Table 6**), the pattern of initial growth, followed by decline during the Covid pandemic, generally follows the overall STR pattern, with the exception of two deviations, where: CSTR permits increase in 2022 (1,107 permits issued) and increase again in 2024 (1,051 permits issued) before experiencing a decline in 2025[10] likely due to the fact that the year has just started. It is important to note that CSTR permits in **Table 6** indicate both renewals as well as new permits.

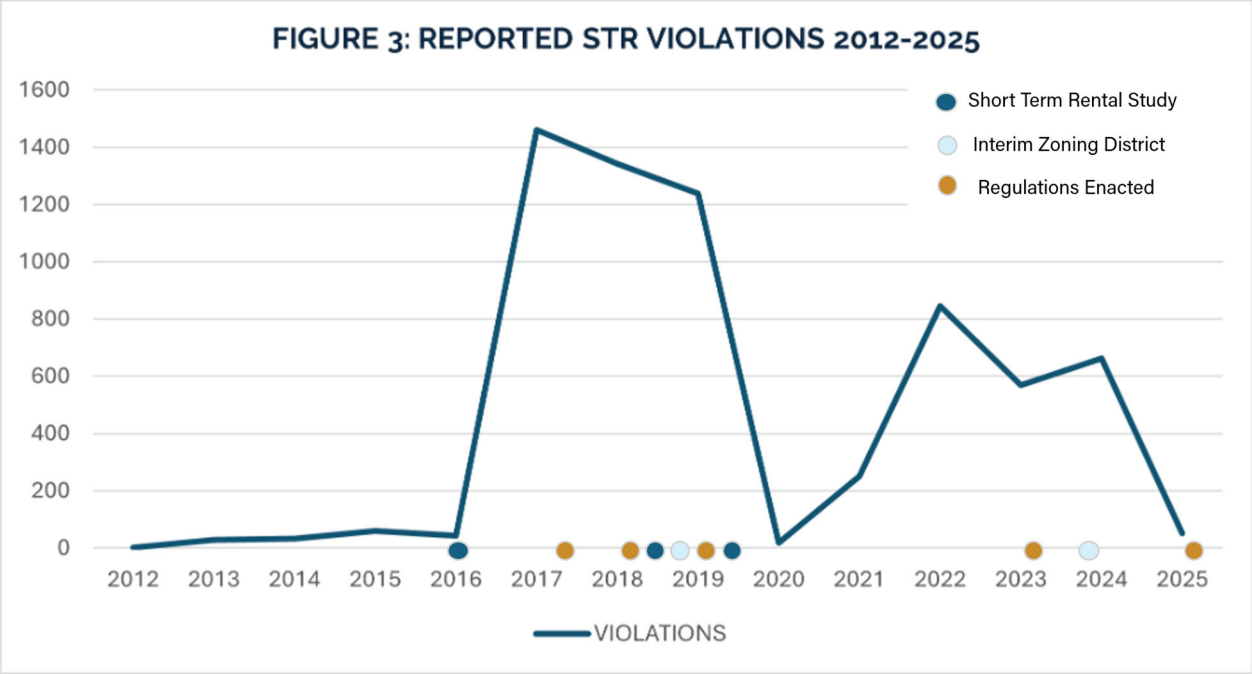
2.5 Code Enforcement Data: Unlicensed Commercial Rentals and Nuisance Complaints

The Department of Safety and Permits Short Term Rental Administration collects data on unlicensed STRs and nuisance complaints. Since 2012, the City has recorded 6,595 alleged STR violations, including operating without a license, exceeding the number of allowed guests, and nuisance complaints. **Table 7** lists total violations per year as well as the number of cases that were adjudicated, and **Figure 3** illustrates patterns across the reported violations. It is important to note that due to regulatory constraints, adjudication of STRs did not start until December 2016; therefore, there were not any adjudicated cases until 2017. The pandemic also reduced both reported violations and adjudication in 2020. Additionally, there was a temporary restraining order in place preventing the City from acting on any cases from September 1, 2023, to July 8, 2024.[11] The data also does not include adjudication numbers from 2025 as it was accessed at the beginning of the year.

TABLE 7: REPORTED STR VIOLATIONS AND ADJUDICATION

YEAR	VIOLATIONS	ADJUDICATION	PERCENT
2012	1	0	0%
2013	28	0	0%
2014	33	0	0%
2015	60	0	0%
2016	43	0	0%
2017	1,460	238	16.3%
2018	1,341	208	15.5%
2019	1,238	97	7.8%
2020	17	9	52.9%
2021	250	43	17.2%
2022	845	90	10.7%
2023	568	28	4.9%
2024	662	125	18.9%
2025	51	-	-

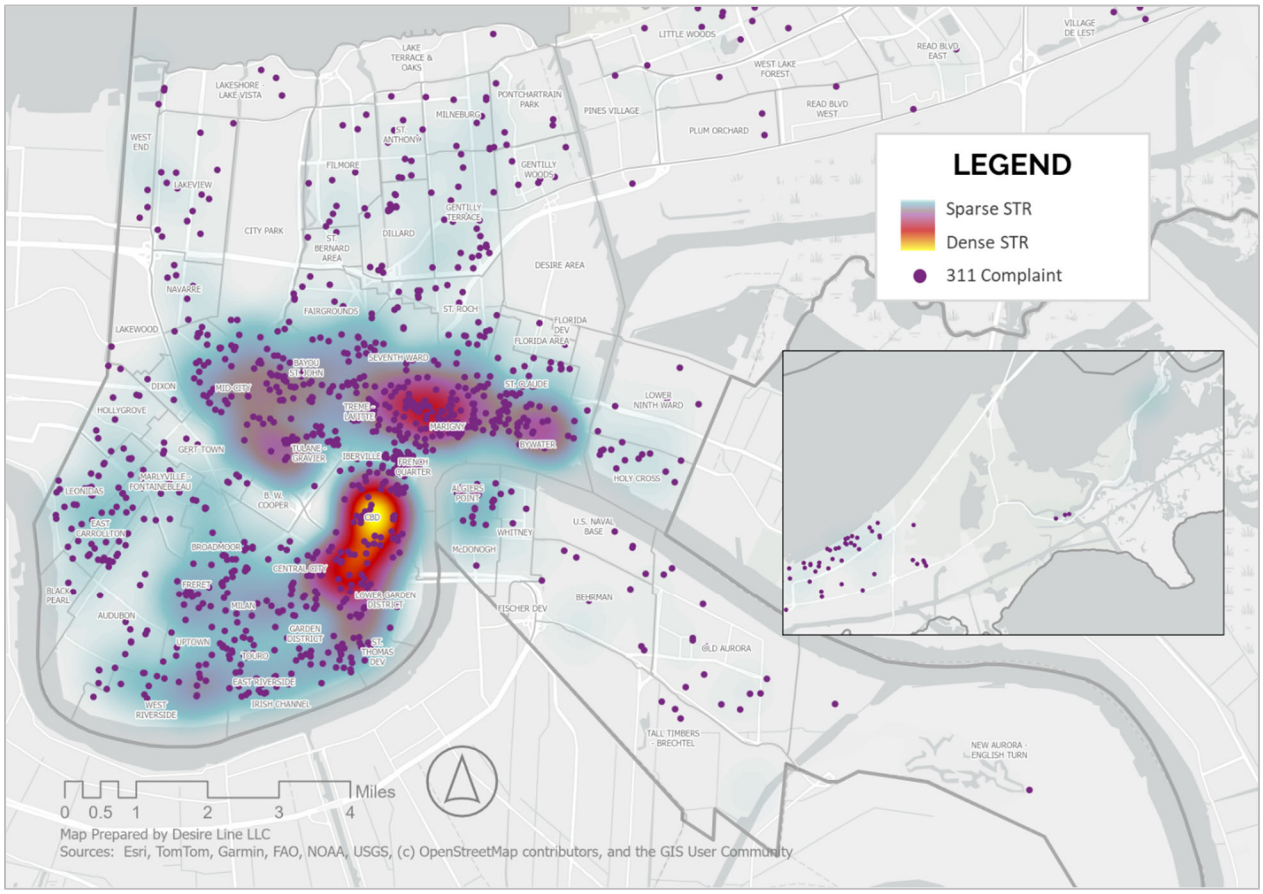
[10] Permit data as of February 26, 2025
[11] *Rental Administration.* (2023). City of New Orleans. Temporary Restraining Order Pertaining to Rentals. https://nola.gov/next/short-term-rental-administration/announcements/temporary-restraining-order-strs/



The number of Code Enforcement violations increased from 2017 to 2020, both during a significant spike in permits issued and when the first STR studies and new regulations went into effect. There was a drop in 2020 (adjudications were not completed during the pandemic), and then violations continued to increase from 2021 to 2025, although at a lower overall rate than between 2017 and 2019. This trend likely reflects both the City's and the public's adjustments to studies (and subsequent regulations) in 2016, 2018, and 2021, where increases in violations are a result of new standards going into effect and being enforced to continuously limit the negative impacts of STRs across the City.

The data around reported noise and STR complaints can also provide insight into the negative impact of STRs. These complaints are reported through the City's 311 system. **Figure 4** depicts these complaints throughout the City from 2021-2025 and emphasizes that most of these complaints emerged from the Central Business District, Central City, Lower Garden District and Marigny neighborhoods in those years.

FIGURE 4: NOISE AND STR COMPLAINTS, 2021-2025[12]



Overall, code enforcement data shows a trend of enforcement that is not unlike other land use activities, when a series of new regulations are put into place (spikes in complaints / violations after new ordinances are adopted, with a declining trend over time). This suggests that regulating STRs over time has been successful; i.e., the City has not simply adopted standards but has also taken steps to enforce them. However, there are a significant number of illegally operating STRs. Granicus reports a total of 10,567 STR listings (both CSTR and NSTR) in the City in 2025.[13] Of these listings, 855 were determined to be compliant, 4,740 were deemed non-compliant due to lack of registration, 2,812 were deemed non-compliant due to exceeding the max capacity, and 2,160 have not yet had the compliance status determined. This results in a total of 7,552 non-compliant listings. These listings are spread throughout the City, both inside and outside of the areas that allow CSTRs. Additionally, there could be NSTRs or CSTRs operating that do not meet the current regulations, as they were in operation before the regulations changed.[14] However, these nonconforming uses are accounted for under the legal permitting process. Inside Airbnb also reports that 86.4% of STR listings in the City are entire homes or apartments with 111 average nights booked per year. Further, 18.2% of listings are unlicensed, and 64.3% of listings are from hosts with multiple listings. It is important to note that Inside Airbnb does not account for different types of STRs, such as XSTRs, which are Hotels or Bed and Breakfasts with

[12] City of New Orleans. (2025). *311 Data.* https://datadriven.nola.gov/open-data/featured/311-calls/.
[13] City of New Orleans. (2025). *Granicus Dashboard.*
[14] Ibid.

STR licenses. Newly enacted Ordinance No. 30300, which increased regulations on hosting platforms, could help with the unlicensed unit issue, and in fact resulted in an 88% decrease (total 905) in noncompliant listings as of August 2025.

3. Transient Lodging Uses and the Tourism Economy

3.1 Generally

This Section describes tourism counts and spending in the City with a focus on the impacts of transient lodging uses on the market and jobs. It is important to note that because STRs are not specifically identified within the standards industry classification codes (i.e., NAICS Codes), STR impacts to the economy (jobs, wages, etc.) are not tracked and measured like traditional land uses such as hotels, Bed and Breakfasts. To understand them, a more macro view of their impact is necessary. However, where reasonable conclusions can be drawn from existing datasets, they are asserted with a degree of uncertainty and included in this Appendix for discussion purposes only. Regardless of this challenge, both the macro and micro-analysis of STRs confirm that STRs have been a significant part of the City's post pandemic recovery economy; helping the City return to 2019 pre-pandemic levels in tourism spending, tax revenues, etc. Additionally, special STR tax revenues distributed to the Quality of Life Fund represent a new source of revenue for the City that was not previously available and that generates significant income ($7M in 2023) for city residents.

3.2 Tourism, Spending, and Lodging Demand

Transient lodging uses are directly tied to tourism. When someone visits the City, they typically stay at a Hotel, Motel, Bed and Breakfast, or STR (residential or commercial). The distinction between a CSTR and an NSTR is not readily discernable, especially to tourists, as they often look like a typical housing unit. Understanding tourism spending trends over the years not only helps estimate lodging demand but also stresses the importance of providing an adequate supply of lodging land use activities to encourage and support the tourist industry in years to come.

Prior to the pandemic, the City of New Orleans saw a steady increase in visitors and visitor spending.[15] During the pandemic, from 2020-2022, visitors to the City spent significantly less than in prior years ($4.5 billion).[16] While the pandemic caused a decrease in tourism, it has steadily increased since the pandemic.[17]

Table 8 reflects tourism visitation and spending in the City from 2003 to 2024. It depicts the decrease in visitation and spending due to Hurricane Katrina and the pandemic, with the years following the pandemic remaining below the 2019 numbers, but 2024 almost reaching 2019 levels.

[15] About New Orleans & Company. (2025). Retrieved from https://www.neworleans.com/about-us/about-new-orleans-and-company/#:~:text=We%20are%20driven%20by%20four,Restore%20International%20Tourism.
[16] New Orleans Tourism Statistics - how many people visit? (2024). Retrieved from https://roadgenius.com/statistics/tourism/usa/louisiana/new-orleans/.
[17] Joseph, C. (2024). "New Orleans Tourism Leader Expects 2023 Year-End Data to Show Continued Growth." Retrieved from https://www.fox8live.com.

TABLE 8: NEW ORLEANS VISITATION AND SPENDING[18]

YEAR	VISITOR COUNT	INCREASE/ DECREASE	SPENDING	INCREASE/ DECREASE
2003	8.5 million	N/A	$4.5 billion	N/A
2004	10.1 million	18.8%	$4.9 billion	8.9%
2005	N/A	-	-	-
2006	3.7 million	(63.4%)	$2.8 billion	(42.9%)
2007	7.1 million	91.9%	$4.8 billion	71.4%
2008	7.6 million	7.0%	$5.1 billion	6.3%
2009	7.5 million	(1.3%)	$4.2 billion	(17.6%)
2010	8.3 million	10.7%	$5.3 billion	26.2%
2011	8.75 million	5.4%	$5.47 billion	3.2%
2012	9.01 million	3.0%	$6.17 billion	12.8%
2013	9.28 million	3.0%	$6.47 billion	4.9%
2014	9.52 million	2.6%	$6.81 billion	5.3%
2015	9.78 million	2.7%	$7.05 billion	3.5%
2016	10.45 million	6.9%	$7.41 billion	5.1%
2017	17.74 million	69.8%	$8.7 billion	17.4%
2018	18.51 million	4.3%	$9.1 billion	4.6%
2019	19.75 million	6.7%	$10.5 billion	15.4%
2020	N/A	-	-	-
2021	15.73 million	(20.4%)	$8.33 billion	(20.7%)
2022	17.53 million	11.4%	$9.1 billion	9.2%
2023	17.94 million	2.3%	$9.6 billion	8.3%
2024	19.08 million	6.4%	$10.4 billion	8.3%

In 2021, a total of 15.73 million visitors spent $8.3 billion, and in 2022, a total of 17.53 million visitors spent $9.1 billion in Orleans Parish. In 2023, 17.94 million visitors spent $9.6 billion, and in 2024, 19.08

[18] New Orleans and Company. (2025, June 13). *New Orleans Reaches Tourism Milestone: 19 Million Visitors for the First Time Since COVID.* New Orleans and Company. https://www.neworleans.com/articles/post/new-orleans-reaches-tourism-milestone-19-million-visitors-for-the-first-time-since-covid/.

million visitors spent $10.4 billion. Additionally, even more people visited the City in 2025, due to a combination of Mardi Gras and the Super Bowl.[19] In fact, over 100,000 tourists visited the City for the Super Bowl alone.[20]

Examining the numbers prior to the pandemic, the median increase in visitation was 5.4% and the median increase in expenditures was 5.3%. **Table 9** estimates the increased visitor counts and spending amounts if this median rate of increase continues over the next 5 years.

TABLE 9: CITY OF NEW ORLEANS PROJECTED VISITOR COUNT AND SPENDING

YEAR	VISITOR COUNT	SPENDING
2025	20.03 million	$10.92 billion
2026	21.03 million	$11.5 billion
2027	22.08 million	12.08 billion
2028	23.18 million	12.68 billion
2029	24.34 million	13.31 billion
2030	25.56 million	13.98 billion

Should federal policies to crack down on crime and illegal immigration in cities, issue national travel bans, and negotiate tariffs continue; it is reasonable to anticipate possible negative impacts on New Orleans' tourism industry.[21] There is increasing evidence that the tourism industry is more likely to shrink than expand as predicted if these conditions/policies continue or worsen.[22] "The World Travel & Tourism Council projected in May 2025 that the U.S. would be the only country among the 184 it studied where foreign visitor spending would fall in 2025."[23]

However, should estimates in **Table 9** manifest in the future, higher demand for hotels and transient lodging uses will be a longer-term by-product of this trend. Whether the number of transient lodging accommodations (including STRs) will be available to support the demand estimated in the next 10 years is a key consideration of this Study. An analysis by the University of New Orleans Hospitality

[19] Hingle, E. (2024). *Checking in on the State of Tourism in Louisiana*. Retrieved from https://www.whereyat.com/louisiana-tourism.
[20] Lang, A. (2025, February 10). *New Orleans leaves impact on visitors as Super Bowl LIX festivities come to close.* New Orleans Saints. https://www.neworleanssaints.com/news/super-bowl-lix-new-orleans-impact-celebrity-reactions-media-quotes-eagles-chiefs.
[21] Herzlich, Taylor (2025). *Trump's immigration, trade policies could cost tourism industry $12B: report.* The New York post. https://nypost.com/2025/06/06/business/trumps-immigration-trade-policies-could-cost-12-billion-in-losses-for-tourism-industry-report/
[22] Marcantel, S. (2025). *Lt. Governor says that tariffs will hurt Louisiana tourism.* The Advocate. https://www.theadvocate.com/acadiana/news/lt-governor-says-that-tariffs-will-hurt-louisiana-tourism-visitors-still-down-from-pre-pandemic/article_22a08c61-a9ee-41df-b561-1580d6beec93.html
[23] Yamat, Rio (2025). *A downturn in international travel to the US may last beyond summer, experts warn*. Associated Press. https://apnews.com/article/international-travel-us-decline-trump-canada-fd1b3fc3225703ee3e521754a171ecfb

Research Center[24] found that the capacity of hotels increased from 100% in 2021, to 108% in 2022 and 112% in 2023. The study measured hotel capacity by comparing the rooms available as a ratio of monthly data in 2015. Therefore, hotel capacity has grown exponentially since 2015. The study measured hotel demand by analyzing the number of rooms rented per night and found that hotel demand also grew from 82% in 2021, to 98% in 2022 and 2023. The University's analysis did not differentiate between hotels and transient lodging uses (including STRs). Should these trends of increasing hotel capacity *and* demand continue, the hotel capacity should continue to meet the demand as visitor counts and spending continue to grow over the next 10 years.

Increased visitor counts and spending also result in an increase in jobs and revenue for the City. In Louisiana, the Louisiana Office of Tourism reported the lodging industry created 18,936 direct and indirect jobs and produced $683 million in direct and indirect labor income in 2023.[25] Further, the value added impacts in the lodging industry in the state totaled $1,760 million.[26]

3.3 Impacts to Employment

Understanding how tourism employment has increased over time can help to predict how it will increase in the future. A Study by the University of New Orleans Hospitality Research Center found that direct employment in tourism in the New Orleans-Metairie Metropolitan Statistical Area increased from 2021 to 2023. *Direct employment* is defined as jobs created or supported by visitor spending in the state, and GR refers to the growth rate over time (**Table 10**).

TABLE 10: DIRECT TOURISM EMPLOYMENT IN THE NEW ORLEANS-METAIRIE MSA[27,28]

EARNINGS (MILLIONS)				EMPLOYMENT (THOUSANDS)			
2021	2022	2023	GR	2021	2022	2023	GR
$2,414	$2,951	$2,950	0%	80.6	95.3	96.3	1%

Additionally, in Orleans Parish alone, tourism employment has grown exponentially since 2020, with a growth rate of 2% from 2022 to 2023 (**Table 11**). This is a higher growth rate than the Metropolitan Statistical Area (or MSA), highlighting a higher number of tourism-based jobs in the City.

[24] Hossain, M. (2023). Tourism Spending in Louisiana Parishes. *The University of New Orleans Hospitality Research Center*. https://www.explorelouisiana.com/sites/default/files/2024-07/Louisiana%20Parishes%20Spending%20Report%202023%20REV.pdf.
[25] Tourism Economics: An Oxford Economics Company. (2024, May). *Economic Impact of Visitors in Louisiana 2023.* https://www.explorelouisiana.com/sites/default/files/2024-07/2023%20Louisiana%20Tourism%20Economic%20Impact%20REV.pdf
[26] Ibid.
[27] Hossain, M. (2023). Tourism Spending in Louisiana Parishes. *The University of New Orleans Hospitality Research Center*. https://www.explorelouisiana.com/sites/default/files/2024-07/Louisiana%20Parishes%20Spending%20Report%202023%20REV.pdf.
[28] The New Orleans-Metairie MSA includes Jefferson, Orleans, Plaquemines, St. Bernard, St. Charles, St. James, St. John the Baptist, and St. Tammany. St. Tammany was removed in 2023.

TABLE 11: TOURISM EMPLOYMENT IN NEW ORLEANS[29]

TOURISM EMPLOYMENT (THOUSANDS)				
2020	**2021**	**2022**	**2023**	**GR**
36.98	45.80	55.30	56.42	2%

The Hilton Foundation predicts that the accommodation and food services industry in the Greater New Orleans Region will continue to grow a total of 16% between 2017 and 2027.[30] In 2017, lodging and accommodation services accounted for 17% of total employment in the Region, where 5% of the industry's occupations included housekeeping cleaners, 2% were desk clerks, 3% were cashiers, and 2% were maintenance and repair workers (**Table 12**). Many of these positions were also entry level and nonsupervisory, having a relatively low median wage.

TABLE 12: OCCUPATION BREAKDOWNS IN HOSPITALITY AND TOURISM INDUSTRY, 2017[31]

OCCUPATIONS	SHARE IN SECTOR	MEDIAN WAGE (PER HOUR)
Maids and Housekeeping Cleaners	5%	$9.95
Cashiers	3%	$8.90
Hotel, Motel, and Resort Desk Clerks	2%	$10.99
Maintenance and Repair Workers	2%	$17.29

According to the U.S. Census Bureau, the collective number of employees in the arts, entertainment, and recreation, and accommodation and food services industry in New Orleans has steadily decreased since 2018, with a large decrease in 2021. There has been a slight uptick in employment from 2021 to 2023, but 2023 is still well below the 2018 total (**Table 13, Figure 5**).

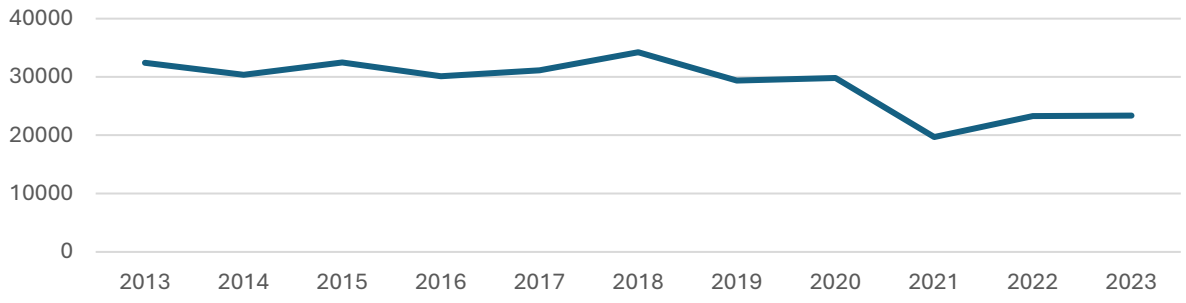
TABLE 13: ARTS, ENTERTAINMENT, AND RECREATION, AND ACCOMMODATION AND FOOD SERVICE EMPLOYEES[32]

YEAR	TOTAL EMPLOYEES
2013	32,398[33]
2014	30,338
2015	32,456

[29] Ibid.
[30] Smith, T.L. (2018, November). *Hospitality and Tourism in the New Orleans Region: A Labor Market Snapshot.* Hilton Foundation. https://www.hiltonfoundation.org/wp-content/uploads/2018/11/Hilton-Hospitality-NOLA-Final-111518-3.pdf
[31] Smith, T.L. (2018, November). *Hospitality and Tourism in the New Orleans Region: A Labor Market Snapshot.* Hilton Foundation. https://www.hiltonfoundation.org/wp-content/uploads/2018/11/Hilton-Hospitality-NOLA-Final-111518-3.pdf
[32] U.S. Census Bureau. (2013-2023). Industry by Occupation for the Civilian Employed Population 16 Years and Over. American Community Survey, ACS 1-Year Estimates Subject Tables, Table S2405. https://data.census.gov/table/ACSST1Y2013.S2405?t=Occupation&g=050XX00US22071.
[33] Ibid.

2016	30,099
2017	31,126
2018	34,238
2019	29,372
2020	29,788
2021	19,703
2022	23,268
2023	23,361

FIGURE 5: CITY OF NEW ORLEANS ARTS, ENTERTAINMENT, AND RECREATION, AND ACCOMMODATION AND FOOD SERVICES EMPLOYEES, 2013-2023



The North American Industry Classification System (or NAICS) classifies specific industries and establishments by Code, and the Bureau of Labor Statistics (or BLS) collects data on those industries. Delving deeper into the more specific NAICS Code data, specifically the Code for traveler accommodation (i.e.; 7211), includes transient lodging uses, such as hotels, motels, bed and breakfasts, and can show jobs created in the transient lodging industry. The number of establishments in NAICS Code 7211 in New Orleans was 225 in 2023, with a total of 9,287 employees (**Table 14**)[34]. There is limited detailed data available for STR employees within this sector, so it is difficult to reach conclusions regarding employment in the industry in the future. This data was supplemented with stakeholder meetings and feedback to obtain more information on employment and pay for STR-type accommodations.

[34] U.S. Bureau of Labor Statistics Data Tools. (2013-2023). *Quarterly Census of Employment and Wages*. https://data.bls.gov/PDQWeb/en

TABLE 14: TRAVELER ACCOMMODATION NAICS CODE DETAILS[35]

YEAR	NAICS CODE	NUMBER OF ESTABLISHMENTS	ALL EMPLOYEES	ANNUAL WAGES	AVERAGE WEEKLY WAGE	AVERAGE ANNUAL PAY
2013	7211	169	10737	$358,003	$641	$33,344
2014	7211	168	10930	$373,748	$658	$34,194
2015	7211	171	11146	$386,146	$666	$34,644
2016	7211	177	11700	$404,415	$665	$34,565
2017	7211	191	11705	$412,713	$678	$35,260
2018	7211	198	11971	$425,082	$683	$35,509
2019	7211	204	11743	$430,368	$705	$36,648
2020	7211	221	6593	$239,363	$698	$36,305
2021	7211	229	6188	$255,462	$794	$41,284
2022	7211	235	8612	$383,775	$857	$44,563
2023	7211	225	9287	$431,047	$893	$46,414

3.4 State and Local Tax Revenues Specific to Transient Lodging Uses

Transient lodging uses contribute to a number of tax funds in the City of New Orleans. Hotels and Motels pay 4% to the Louisiana Stadium and Exposition District Room Occupancy Tax, 3% to the Ernest N. Morial New Orleans Exhibition Hall Authority Tax, 50 cents per night for hotels with 10 to 299 rooms, 1 dollar per night for hotels with 300 to 999 rooms, and 2 dollars per night for hotels with 1,000 or more rooms.[36] Bed and Breakfasts contribute $200 per year for 1 and 2 room rentals, and $600 per year for 3 to 5 room rentals. There is an additional occupational license tax of $2 per room for Bed and Breakfasts with 6 or more rooms. Additionally, Bed and Breakfasts pay a hotel occupancy tax of 50 cents per room per 24-hour period if they have 3 to 9 rooms.[37]

In 2023, the Ernest N. Morial Convention Center earned $2 million in tax dedications, the New Orleans Metropolitan Convention and Visitors Bureau Fund received over $12 million, the New Orleans Sports Franchise Fund received over $11 million, and the New Orleans Quality of Life Fund received over $7 million in local dedications from state hotel and motel sales tax collections.[38] In total, the State collected $502 million in other taxes in 2023, which includes Hotel and Motel room occupancy taxes. **Table 15** details the tax collected from Hotel and Motel room occupancy taxes from 2017-2022. The Ernest N. Morial Convention Center Fund has the same tax dedication each year, and the New Orleans Convention and Visitors Bureau Fund and New Orleans Sports Franchise Fund receive a large dedication each year, with a dip in 2020 and 2021 likely due to the pandemic.

[35] Ibid.
[36] Louisiana Department of Revenue. (2025). *New Orleans Exhibition Hall Authority – Hotel Occupancy & Additional Paid Occupancy Tax.* Louisiana Department of Revenue. https://revenue.louisiana.gov/businesses/sales-taxes/new-orleans-exhibition-hall-authority-hotel-occupancy-additional-paid-occupancy-tax.
[37] City of New Orleans. (2025). *Bed & Breakfast Occupational License*. Nola.gov. https://nola.gov/bed-and-breakfast-license/
[38] Louisiana Department of Revenue. (2022-2023). *Annual Tax Collection Report.* Louisiana Department of Revenue. https://dam.ldr.la.gov/publications/LDR_Annual_Report%20(2022-2023)%20Final.pdf.

TABLE 15: TOTAL TAX COLLECTED 2017-2022[39]

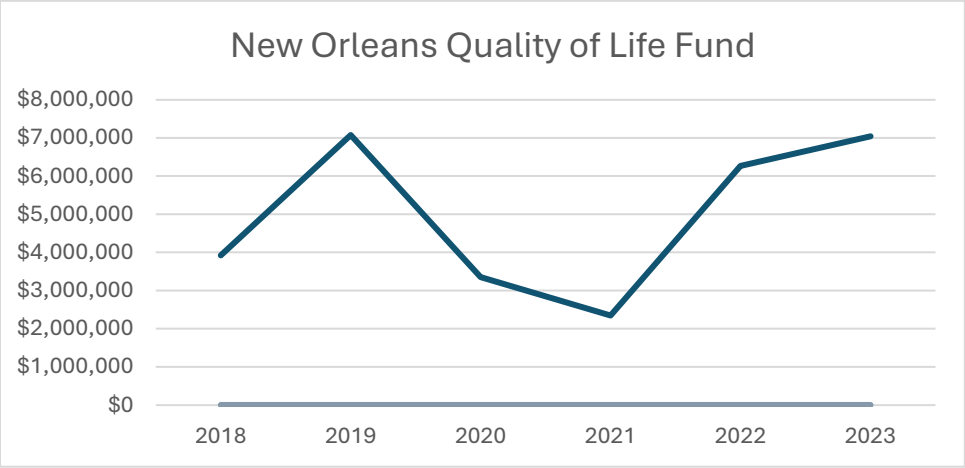
YEAR	FUND	TOTAL TAX COLLECTED ($)
2017	Ernest N. Morial Convention Center Fund	2,000,000
	New Orleans Convention and Visitors Bureau Fund	10,987,745
	New Orleans Sports Franchise Fund	9,327,577
2018	Ernest N. Morial Convention Center Fund	2,000,000
	New Orleans Convention and Visitors Bureau Fund	11,650,631
	New Orleans Sports Franchise Fund	10,010,963
2019	Ernest N. Morial Convention Center Fund	2,000,000
	New Orleans Convention and Visitors Bureau Fund	11,364,455
	New Orleans Sports Franchise Fund	9,715,929
2020	Ernest N. Morial Convention Center Fund	2,000,000
	New Orleans Convention and Visitors Bureau Fund	9,412,535
	New Orleans Sports Franchise Fund	8,003,638
2021	Ernest N. Morial Convention Center Fund	2,000,000
	New Orleans Convention and Visitors Bureau Fund	2,799,181
	New Orleans Sports Franchise Fund	885,749
2022	Ernest N. Morial Convention Center Fund	2,000,000
	New Orleans Convention and Visitors Bureau Fund	13,519,070
	New Orleans Sports Franchise Fund	8,770,135

The revenue CSTRs provide to the City is also actively measured and tracked. In 2017, House Bill 224 created the New Orleans Quality of Life Fund, which implemented a 5% sales tax on STRs, allowing the deposit of 3.97% of the tax into that fund.[40] A total of $7,041,831 was dedicated to the New Orleans Quality of Life Fund in 2023.

[39] Louisiana Department of Revenue (2017-2022). *Annual Report – Tax Collection.* Louisiana Department of Revenue. https://revenue.louisiana.gov/publications/.
[40] Louisiana State Legislature. (2017). *Fiscal Note*. Louisiana Legislative Fiscal Office. www.legis.la.gov/legis/ViewDocument.aspx?d=1039427.

Figure 6 shows the total amount collected for the Fund from 2018 to 2023.[41] There was an approximate $3M increase in funds from 2018 to 2019, the first year of collected data, with an approximate $4.7M decrease in funds from 2019 to 2021. This decrease in funds is likely reflective of the negative impact of the pandemic on the tourism industry. The fund amount increased again in 2022 and 2023, returning to the 2019 amount of approximately $7M.

FIGURE 6: NEW ORLEANS QUALITY OF LIFE FUND[42]



While the 2023 Quality of Life Fund reached pre-2019 numbers, tourism spending also kept pace and nearly reached 2019 spending levels (2019: $5,240,160; 2023: $5,127,910) (**Table 8**, see Tourism Spending). This could reflect STRs continued popularity as part of the City's post-pandemic tourism economy. Further supporting the significant economic impact of STRs in the City's recovery, Airbnb reported in 2023 a total of $23 million in tourism taxes for the City of New Orleans.[43]

[41] Louisiana Department of Revenue. (2019-2023). *Annual Tax Collection Report*. Louisiana Department of Revenue. revenue.louisiana.gov.
[42] Louisiana Department of Revenue. (2019-2023). *Annual Tax Collection Report*. Retrieved January 22, 2025 from revenue.louisiana.gov..
[43] Airbnb. (2023, March 30). *Airbnb Proudly Supports New Orleans' Tourism Economy.* Airbnb Newsroom. news.airbnb.com/airbnb-proudly-supports-new-orleans-tourism-economy/.

4. Housing Redevelopment Opportunities, Occupancy, and Affordability

4.1 Generally

While STRs have contributed to the economy in the City over time – through tourism spending and the New Orleans Quality of Life Fund – they have also had an impact on housing occupancy, affordability, and redevelopment opportunities in the City. This section explores these impacts and compares trends and approaches to support Study considerations.

4.2 STRs Concentrated in Competitive Housing Markets

The Reinvestment Fund (a nonprofit organization with offices in Atlanta and Philadelphia focused on promoting resilient communities through data-driven policy decisions)[44] analyzed the City's housing market value after the pandemic. Their 2023 Market Value Analysis for the City of New Orleans included an assessment of total renters and owners, vacant lots, areas of affordable housing at a variety of median income levels, and population displacement across the City. It further divided the City into clusters based upon market value. **Figure 6** depicts the results of the 2023 Market Value Analysis spatially and shows the City divided into clusters based upon housing market value where:

- ***Purple markets*** **(A, B1, B2)** represent the highest amount in housing sales and are characterized as those areas with the most renovation and new construction activity, and the least housing vacancies.
- ***Blue markets*** **(C, D)** are identified as moderate, or affordable housing markets for residents who make the median family income.
- ***Yellow markets*** **(E, F)** are characterized as single family or townhome districts that could have maintenance issues.
- ***Orange markets*** **(G, H)** represent the least amount in housing sales and are characterized as those areas with high levels of vacancy and subsidized housing.

Figure 8 summarizes the data results of the 2023 Market Value Analysis, establishes a methodology for decision-making for specific market clustering, ***and calls out STRs within the data set for overall consideration***. Of interest to this Study is whether STRs are supporting reinvestment in areas having high vacancies and are contributing to their rehabilitation. Based on the 2023 Reinvestment Fund analysis, STRs tend to locate in more competitive housing markets and are less likely to locate in areas with the highest levels of vacancy.

Specifically, in 2023, permitted STRs represented 4% of all parcels in the City. It is important to note that each parcel could contain multiple STRs. The highest concentration of STRs were in light purple and dark blue clusters B1 (5%), B2 (9%), and C (8%), where housing markets are thriving or considered affordable for residents who make the median family income (**Figures 7 and 8**). In these areas, STRs are competing for units that would likely sell without STRs interest and land use activity. Where STRs could positively influence housing markets (i.e., yellow and orange markets), they represented the lowest concentration of STRs (E: 1%, F: 1%, G: 2%; and H: 0%) signifying STRs aren't a significant contributor to rehabilitation in areas with high vacancies.

[44] The Reinvestment Fund. (2023, October 9). *Market Value Analysis: New Orleans MVA*. The Reinvestment Fund. https://www.reinvestment.com/wp-content/uploads/2021/11/New-Orleans-MVA-Presentation-10.9.23.pdf.

There is some deviation from this pattern, where a smaller share (2%) of STRs is within the darkest purple housing market cluster (A), which may be a result of the land use activity being cost prohibitive in the strongest markets in the City. In contrast, there is a slight increase (2%) in the lighter orange cluster (G), which could indicate markets that are characterized by being on the "edge" or nearer to more competitive markets and—as a result—are seeing more interest from STR investors.

The 2023 Market Analysis indicates that—without intervention—STRs will likely continue to gravitate towards more competitive markets, where homeowners represent a smaller share of the local landscape (B1: 57%, B2: 37%, C:37%), potentially impacting the community's character and culture. If there is a desire to promote STRs within areas of disinvestment to spur economic growth, it will likely require a targeted land use policy to incentivize these activities.

FIGURE 7: 2023 MARKET VALUE ANALYSIS[45]

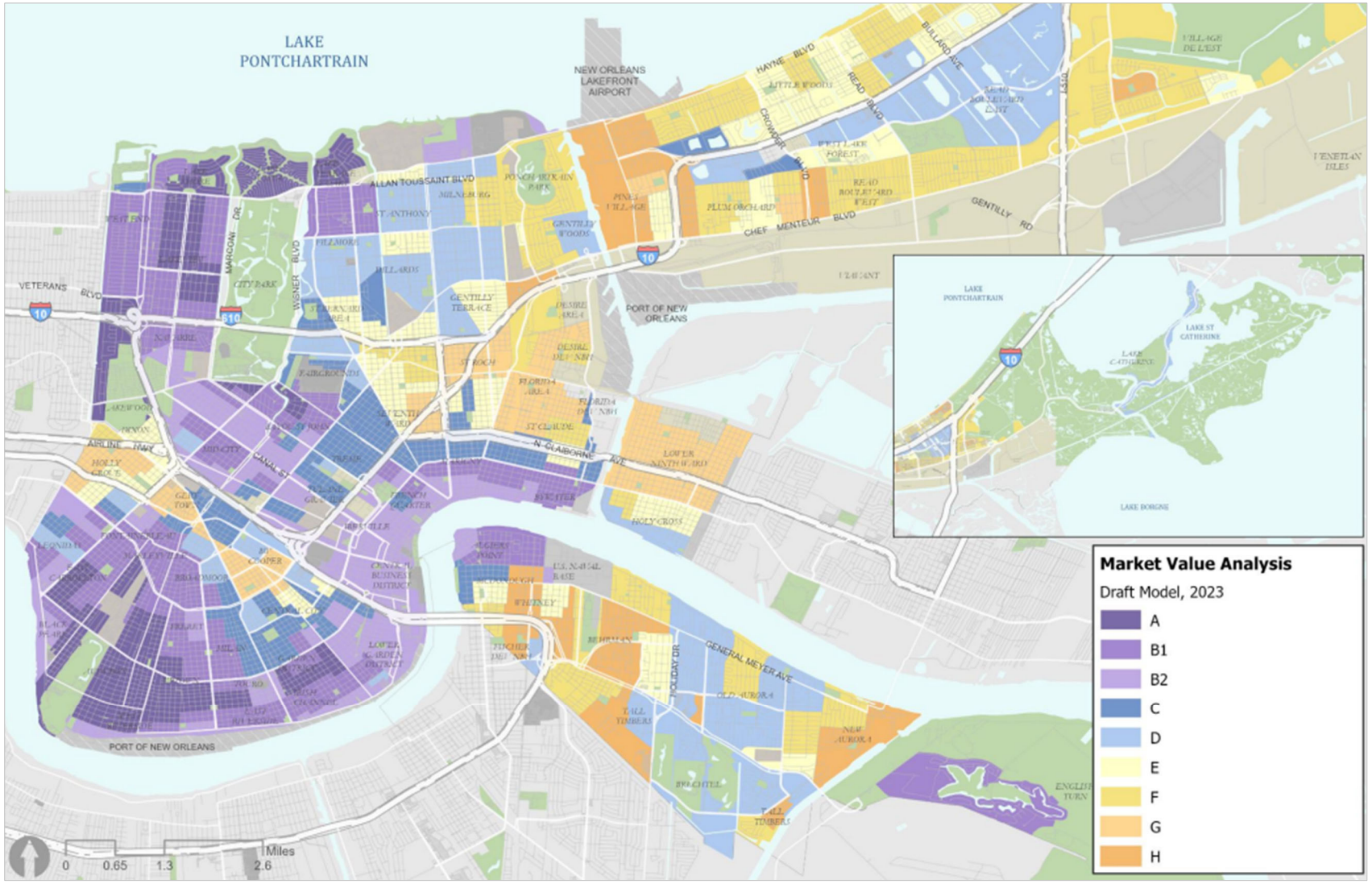


FIGURE 8: 2023 AVERAGE INDICATOR VALUES FOR NEW ORLEANS[46]

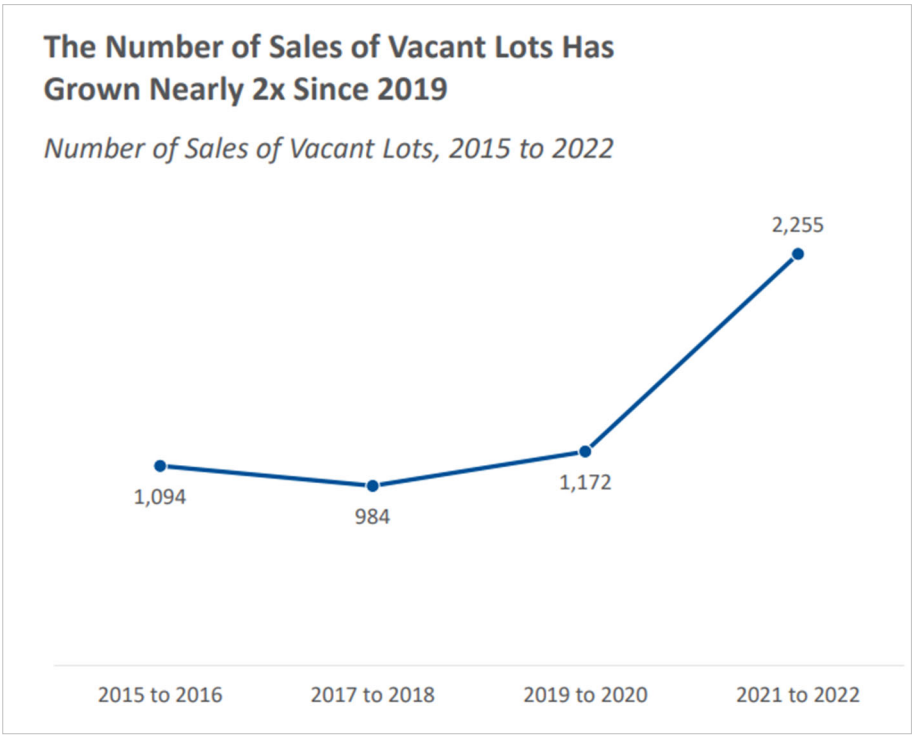
		Median Sales, 21-22	Var. Sales, 21-22	Home Owners	Home Permits, 20-23	Short Term Rentals	Code Viol., 21-22	Distress Sales, 20-23	Vacant Homes	Vacant Land	Lot Sales, 21-22	Subsidized Homes	Homes Per Acre	Pct Res.
A	41	$738,351	0.49	69%	14%	2%	1%	2%	7%	3%	2%	0%	6.8	78%
B1	83	$464,046	0.42	57%	10%	5%	1%	3%	10%	4%	5%	3%	6.6	83%
B2	44	$405,528	0.50	37%	11%	9%	1%	4%	10%	9%	4%	7%	16.3	40%
C	55	$287,054	0.56	37%	11%	8%	2%	8%	17%	14%	15%	14%	11.3	73%
D	43	$275,524	0.40	76%	6%	2%	1%	8%	7%	6%	11%	7%	0.9	82%
E	59	$199,847	0.45	33%	6%	1%	2%	9%	13%	11%	16%	23%	9.2	80%
F	47	$159,839	0.51	75%	4%	1%	1%	11%	7%	13%	20%	15%	2.9	76%
G	29	$138,157	0.63	36%	9%	2%	4%	13%	15%	41%	53%	36%	4.5	79%
H	24	$88,575	0.61	31%	2%	0%	1%	16%	10%	16%	19%	27%	6.7	71%
City Avg.	**441**	**$334,653**	**0.49**	**51%**	**8%**	**4%**	**1%**	**7%**	**10%**	**11%**	**15%**	**13%**	**2.6**	**73%**

[45] The Reinvestment Fund. (2023, October 9). *Market Value Analysis: New Orleans MVA*. The Reinvestment Fund. https://www.reinvestment.com/wp-content/uploads/2021/11/New-Orleans-MVA-Presentation-10.9.23.pdf.
[46] The Reinvestment Fund. (2023, October 9). *Market Value Analysis: New Orleans MVA*. The Reinvestment Fund. https://www.reinvestment.com/wp-content/uploads/2021/11/New-Orleans-MVA-Presentation-10.9.23.pdf.

4.3 A Rise in Infill Development

Tracking the sale of vacant lots in the City can help highlight economic opportunities or challenges. The Reinvestment Fund analyzed the sale of vacant lots from 2015 to 2022 and highlighted a significant increase in sales from 2019 to 2022 (**Figure 9**). This increase is consistent with the increase in STRs from 2017 to 2022 and suggests an increase in infill development opportunities and a decrease in vacant lots throughout the City.

FIGURE 9: SALES OF VACANT LOTS, 2015-2022[47]



4.4 Stagnant Housing Occupancy and Vacancy Rates Despite Increased Development Activity

While the City witnessed a rise in the sale of vacant lots (**Figure 9**) between 2015 and 2022, it maintained relative rates in housing occupancy between 2013 – 2017 (80.8%) and 2018 – 2022 (80.2%), and in vacant housing (19.2% and 19.8%, respectively) (**Table 16**). This suggests that the 2,255 sales of vacant lots did not increase housing occupancy or reduce the overall vacancy rate in the City. This development pattern could reflect the trend of STR units that are renovated, but not permanently occupied, and are considered "vacant." However, since there is no specific data on which vacant lots were sold, it cannot be compared to STR permits to verify a correlation.

[47] The Reinvestment Fund. (2023, October 9). *Market Value Analysis: New Orleans MVA*. The Reinvestment Fund. https://www.reinvestment.com/wp-content/uploads/2021/11/New-Orleans-MVA-Presentation-10.9.23.pdf.

TABLE 16: CITY OF NEW ORLEANS U.S. CENSUS DATA, 2013-2023

	2013-2017	2018-2022	2023
Housing Units			
Occupied Housing Units	80.8%	80.2%	-
Vacant Housing Units	19.2%	19.8%	-

2020 Decennial Census data breaks down the vacancy status of housing units further, where—of the 28,715 vacant units—33.37% were for rent, 4.2% were rented but unoccupied, 6.65% were for sale, 3.94% were sold but unoccupied, 19.27% were for seasonal, recreational or occasional use, and 32.57% were categorized as other vacant (**Table 17**).

TABLE 17: VACANCY STATUS, CITY OF NEW ORLEANS U.S. CENSUS DATA, 2020[48]

VACANCY STATUS	#	%
Total vacant housing units:	28,715	
For rent	9,582	33.37%
Rented, not occupied	1,206	4.20%
For sale only	1,910	6.65%
Sold, not occupied	1,130	3.94%
For seasonal, recreational, or occasional use	5,532	19.27%
All other vacant	9,355	32.57%

It is notable that of all vacant units in 2020, approximately one third (33.37%) were for rent, and more than half (51.84%) fell within the category of "for seasonal, recreational, or occasional use" or "All other vacant." Because Census data does not label housing units as STRs specifically, establishing whether they are characterized within one or both of these categories is not feasible. Together, they do suggest that while development activities have increased citywide, the large share of both of these categories (and their likely inclusion of STRs) could account for limited increases in housing occupancy citywide. It is important to note that NSTR regulations require an onsite owner/operator, where CSTRs do not. Therefore, vacant units could be CSTRs but would not necessarily be NSTRs, unless the NSTR was considered a separate living unit from the owner-operator's living space.

4.5 A Lack of Affordable Housing and Displacement Trends Citywide

The Reinvestment Fund assessed affordability in the City in relation to median family income. *Median family income* is defined as the amount of income for a household of two or more people that divides the population in half, with half of the population above the median and the other half below the

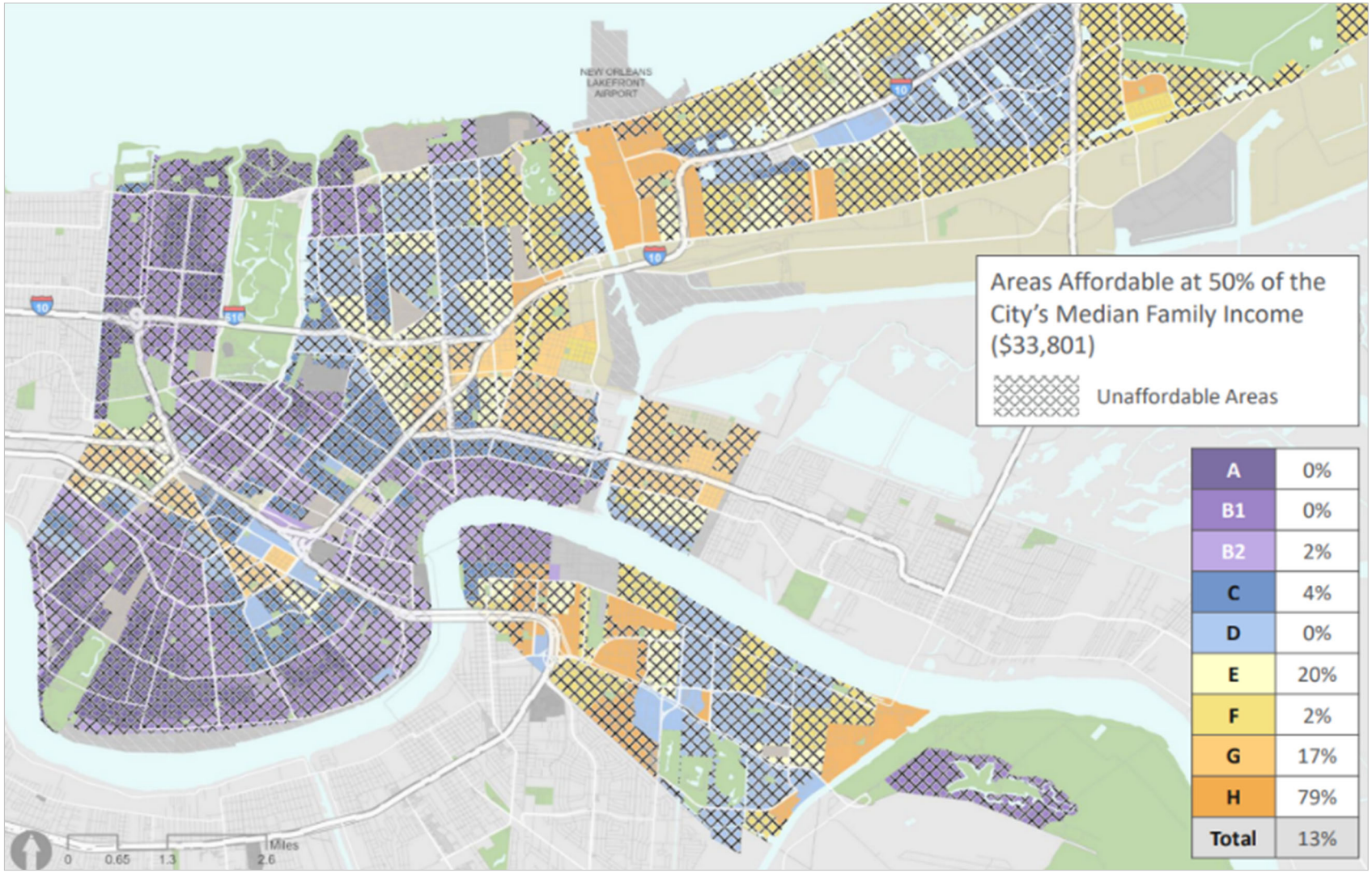
[48] U.S. Census Bureau, U.S. Department of Commerce. (2020). Profile of General Population and Housing Characteristics. *Decennial Census, DEC Demographic Profile, Table DP1*. Retrieved January 7, 2025, from https://data.census.gov/table/DECENNIALDP2020.DP1?q=new orleans&t=Vacancy Characteristics&d=DEC Demographic Profile.

median.[49] Housing is generally considered to be affordable if it falls at or below 30% of a family's income. At 50% and 80% of median family income, which is between $33,801 and $54,082 a year, most (87% - 76%, respectively) of the City's 2023 housing stock was unaffordable. This lack of city-wide affordable housing is shown in **Figure 10** (at 50% of median family income, or $33,801 per year) and **Figure 11** (at 80% of median family income, or $54,082 per year).

The Reinvestment Fund also calculated affordability at 100% and 120% of median family income. As shown in **Figure 12,** at 100% of median family income or $67,602 a year, 63% of the City's housing was unaffordable. As shown in **Figure 13,** at 120% of median family income, or $81,122 a year, 56% of the City remained unaffordable. This data conveys that households who make the median family income for the City, and those who make 20% over the median family income, still cannot afford to live in most areas of the City. These residents include service industry workers, artists, and musicians that underpin the success of New Orleans' cultural economy and spur the demand for STRs.

[49] Guzman, G. (2022, October). *Household Income: 2021.* US Census Bureau. https://www.census.gov/content/dam/Census/library/publications/2022/acs/acsbr-011.pdf.

FIGURE 10: AREAS AFFORDABLE AT 50% OF THE CITY'S MEDIAN FAMILY INCOME[50]



[50] The Reinvestment Fund. (2023, October 9). *Market Value Analysis: New Orleans MVA*. The Reinvestment Fund. https://www.reinvestment.com/wp-content/uploads/2021/11/New-Orleans-MVA-Presentation-10.9.23.pdf.

FIGURE 11: AREAS AFFORDABLE AT 80% OF THE CITY'S MEDIAN FAMILY INCOME[51]

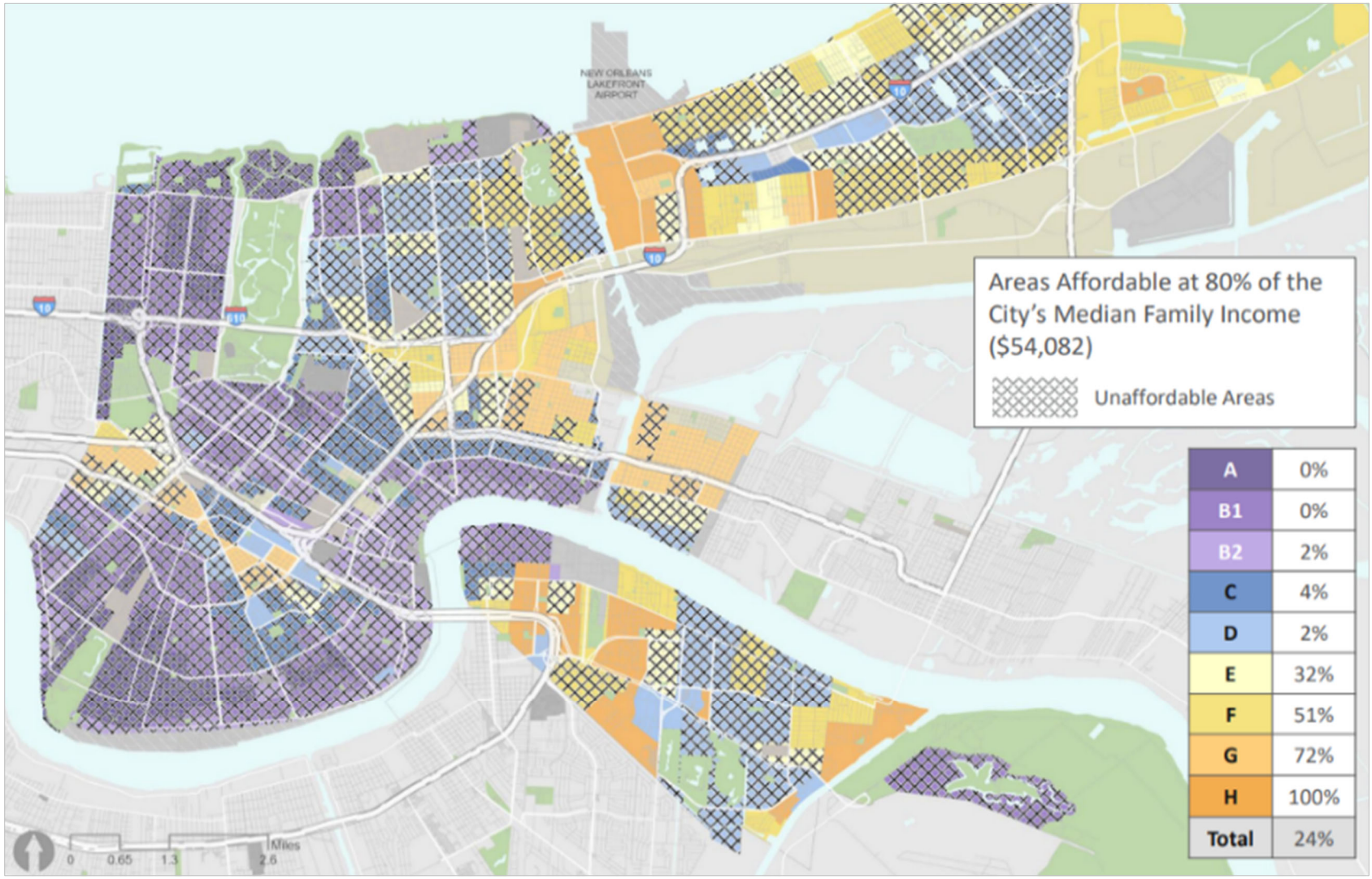
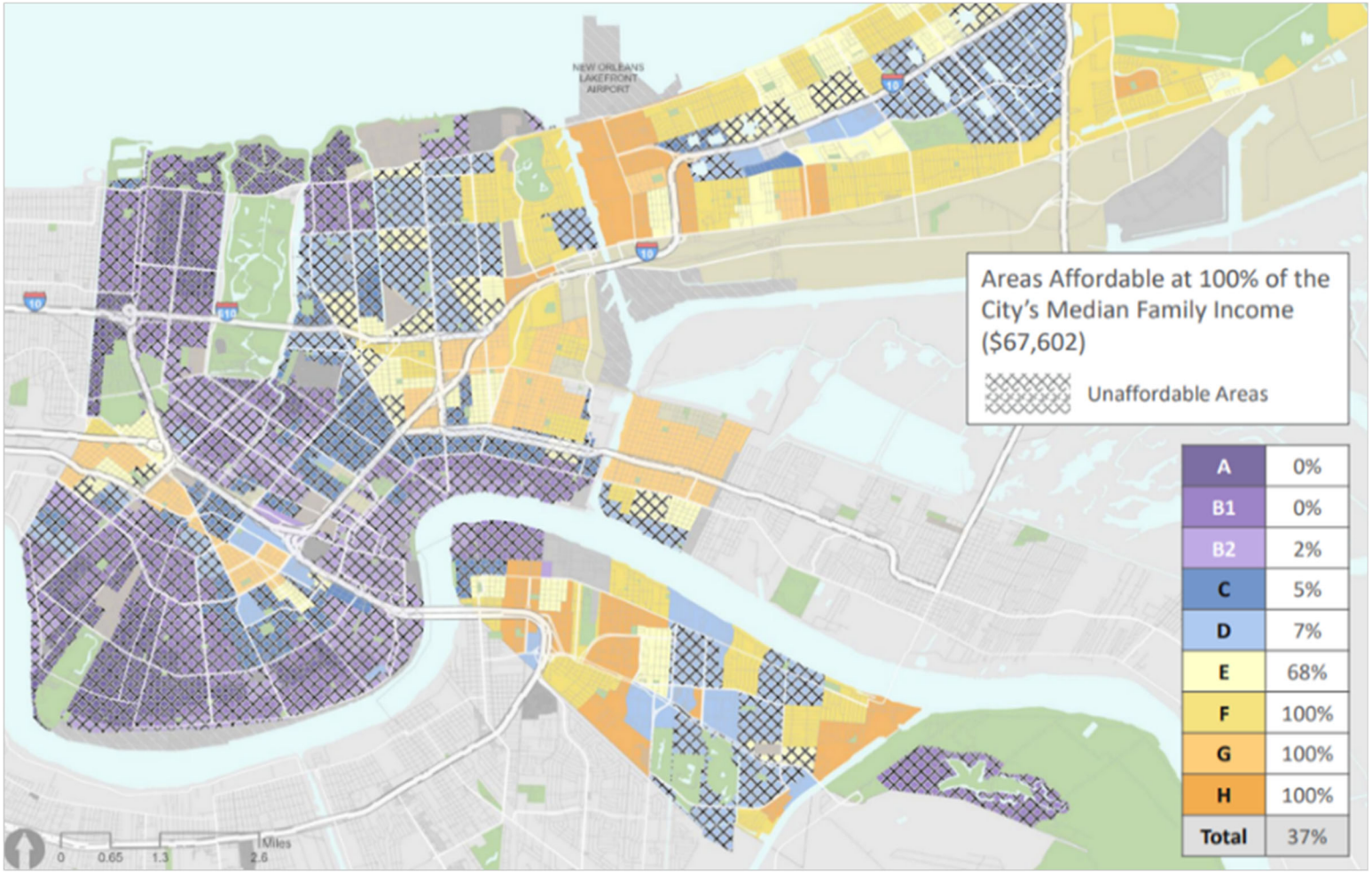
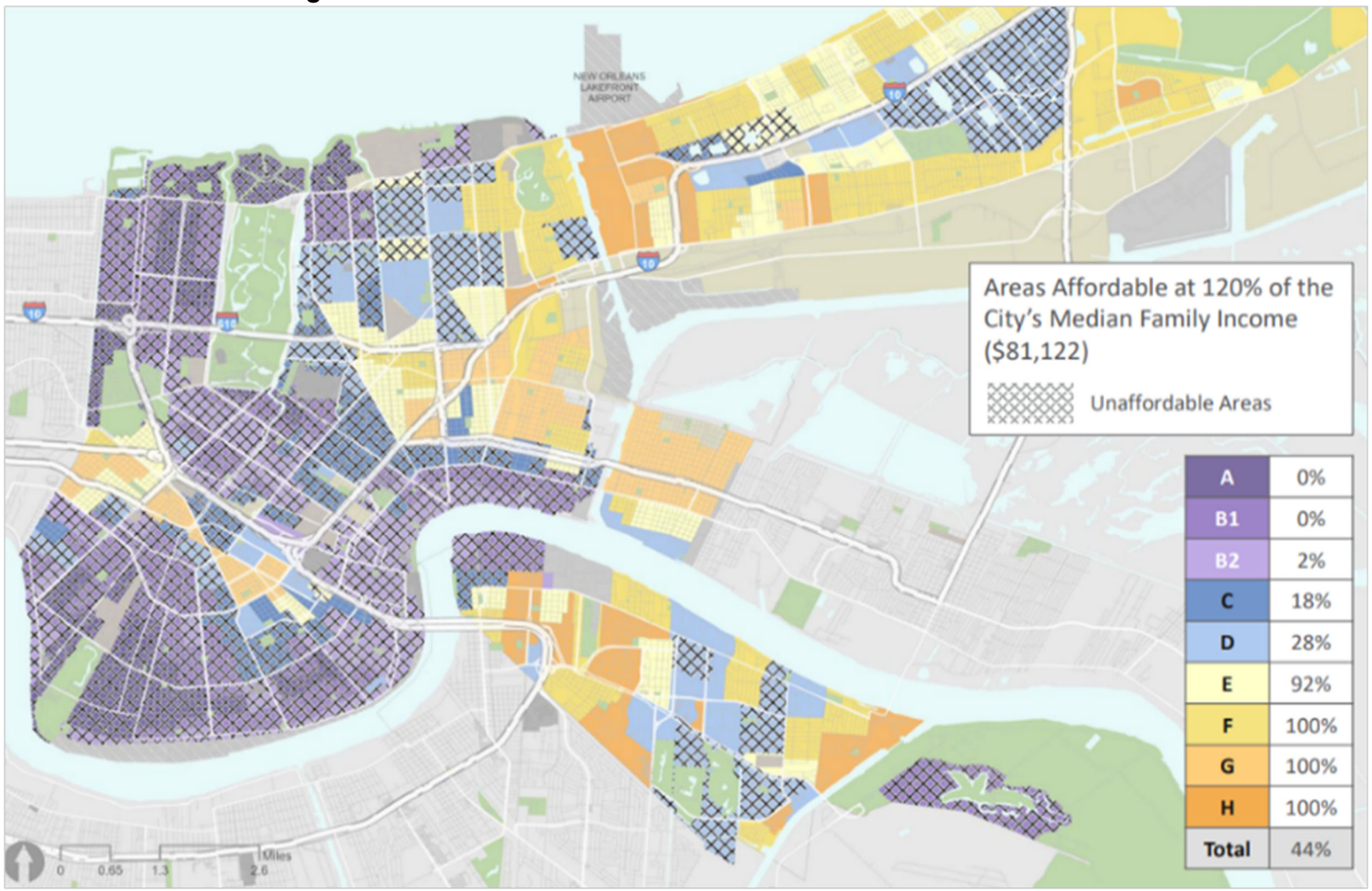


FIGURE 12: AREAS AFFORDABLE AT 100% OF THE CITY'S MEDIAN FAMILY INCOME[52]



[51] The Reinvestment Fund. (2023, October 9). *Market Value Analysis: New Orleans MVA*. The Reinvestment Fund. https://www.reinvestment.com/wp-content/uploads/2021/11/New-Orleans-MVA-Presentation-10.9.23.pdf.
[52] The Reinvestment Fund. (2023, October 9). *Market Value Analysis: New Orleans MVA*. The Reinvestment Fund. https://www.reinvestment.com/wp-content/uploads/2021/11/New-Orleans-MVA-Presentation-10.9.23.pdf.

FIGURE 13: AREAS AFFORDABLE AT 120% OF THE CITY'S MEDIAN FAMILY INCOME[53]



[53] The Reinvestment Fund. (2023, October 9). *Market Value Analysis: New Orleans MVA*. The Reinvestment Fund. https://www.reinvestment.com/wp-content/uploads/2021/11/New-Orleans-MVA-Presentation-10.9.23.pdf.

Table 18 summarizes the data across **Figures 9 to 12**, with a specific interest in understanding how levels of affordability correlate to clusters having the highest concentration of STRs (A, B1, B2, and C, outlined in a heavy red border).

TABLE 18: MEDIAN FAMILY INCOME ANALYSIS ACROSS HOUSING MARKET CLUSTERS SHOWN IN FIGURES 9 to 12

MEDIAN FAMILY INCOME				PERCENT OF AFFORDABLE HOUSING PER MARKET CLUSTER								
Figure	% of Median Family Income	% in Dollars Annually	% of City Unaffordable	A	B1	B2	C	D	E	F	G	H
9	50	$33,801	87%	0%	0%	2%	4%	0%	20%	2%	17%	79%
10	80	$54,082	76%	0%	0%	2%	4%	2%	32%	51%	72%	100%
11	100	$67,602	63%	0%	0%	2%	5%	7%	68%	100%	100%	100%
12	120	$81,122	56%	0%	0%	2%	18%	28%	92%	100%	100%	100%

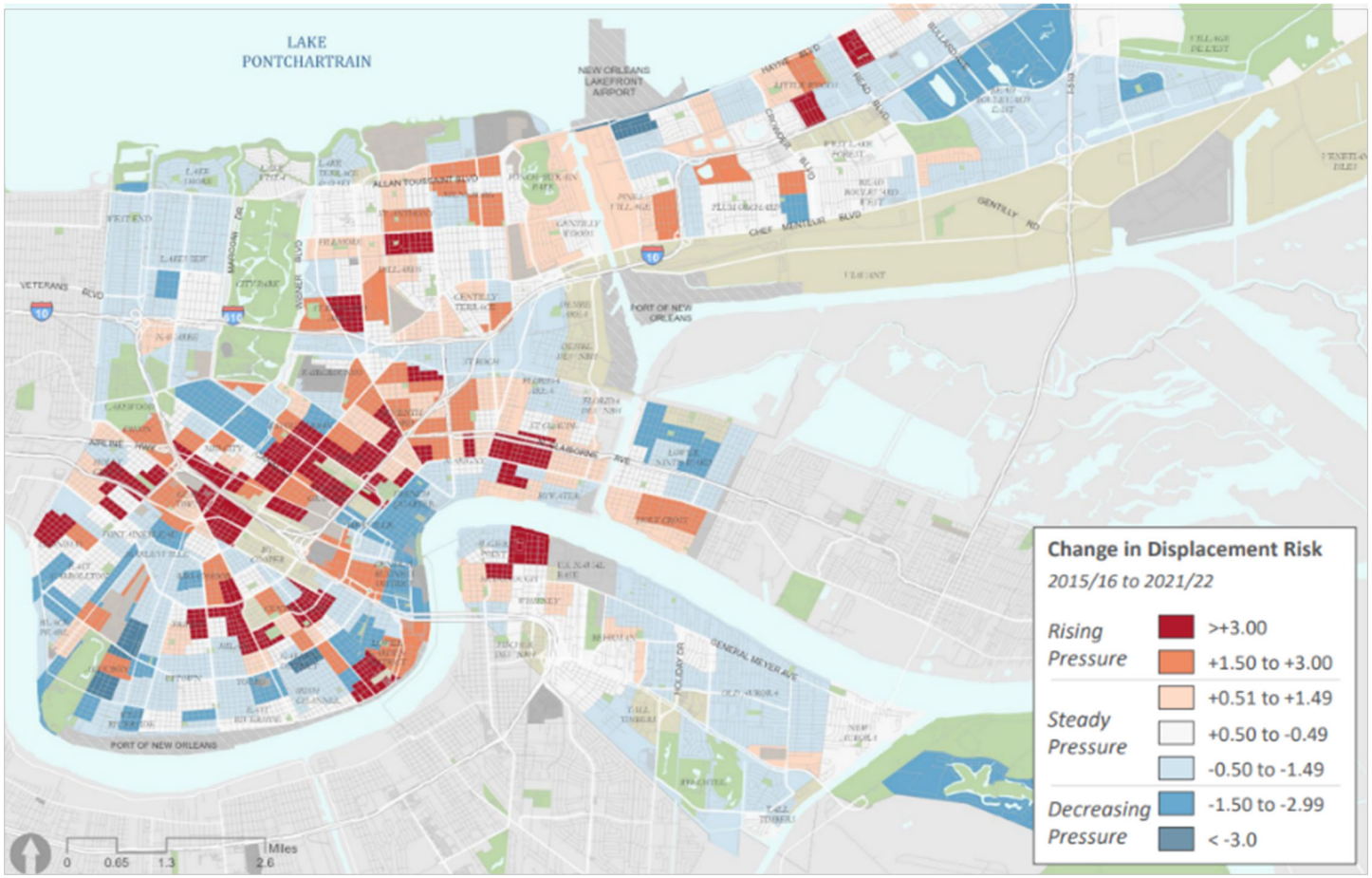
Scaling median family income (50%, 80%, 100%, and 120%) in the City highlights two notable trends:

- With the exception of housing cluster A, those areas with the highest concentrations of STRs in 2023 (B1, B2, and C) also have the lowest rates of housing affordability. However, there is not a causal link to determine if the concentration of STRs in those areas contributes to the unaffordability.
- Those housing units that gradually become increasingly affordable (highlighted in green in **Table 18**) are limited to the weakest housing market clusters where STRs are least likely to locate (H, G, F, and E), with some limited exceptions. Because these areas are currently offering residents the most affordable housing opportunities in the City, and future targeted policy that promote STRs in these areas with the aim of spurring redevelopment activities should be carried out with policies aimed at retaining housing affordability,

Without policies in place to maintain housing affordability for existing residents, lower income populations across the City face pressure to move to areas providing more affordable options. The Reinvestment Fund analyzed the change in displacement ***risk*** and ***pressure in vulnerable markets*** across the City from 2015 / 2016 to 2021 / 2022. **Figure 14** shows a change in displacement risk spatially, where (generally) *rising pressure*

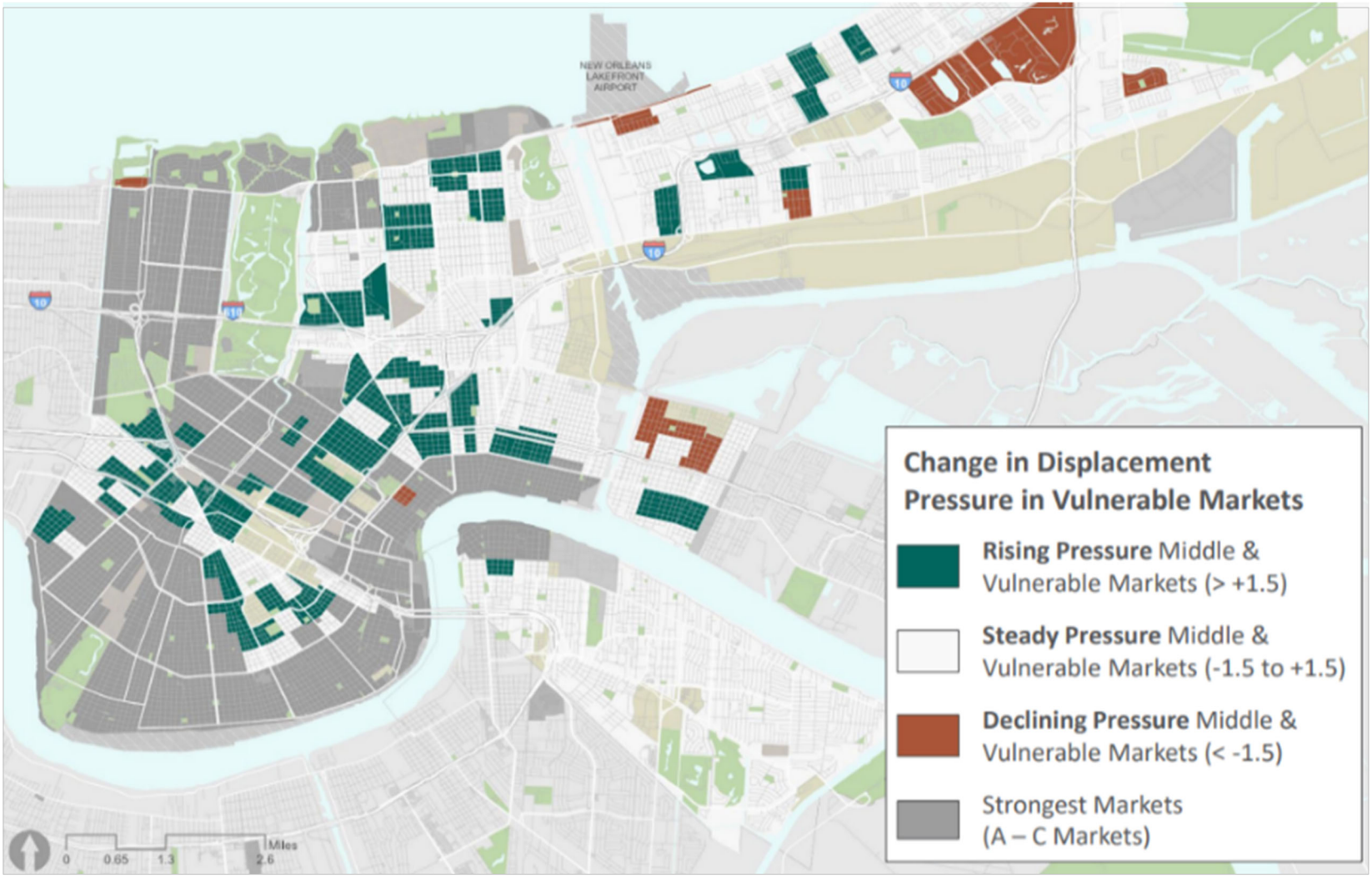
was indicated in areas including downtown, uptown, Algiers Point, Mid City, and Gentilly; *steady or rising pressure* was indicated in most of the heaviest tourist areas, and *declining pressure* was indicated in New Orleans East and the Lower Ninth Ward.

FIGURE 14: CHANGE IN DISPLACEMENT RISK 2015/16 to 2021/22[54]



[54] The Reinvestment Fund. (2023, October 9). *Market Value Analysis: New Orleans MVA*. The Reinvestment Fund. https://www.reinvestment.com/wp-content/uploads/2021/11/New-Orleans-MVA-Presentation-10.9.23.pdf.

FIGURE 15: CHANGE IN DISPLACEMENT PRESSURE IN VULNERABLE MARKETS[55]



[55] The Reinvestment Fund. (2023, October 9). *Market Value Analysis: New Orleans MVA*. The Reinvestment Fund. https://www.reinvestment.com/wp-content/uploads/2021/11/New-Orleans-MVA-Presentation-10.9.23.pdf.

Figure 14 reflects where and how much displacement pressure is occurring city-wide, with a specific interest in middle and vulnerable markets (D, E, F, G, and H) established by the Resilient Fund 2023 Market Study Analysis. Areas shown in grey are both the Strongest Markets in the City (A-C) and where the highest concentrations of STRs were located in 2023 (B1, B2, and C).

Overall, there is steady and increasing displacement pressure in middle and vulnerable markets (D, E, F, G, and H) city-wide, with some limited exceptions in New Orleans East and the Lower Ninth Ward, where displacement pressure is declining (**Figure 14**, shown in dark orange). Given the highest concentration of STRs in 2023 was also within the Strongest Markets (A-C) and the remaining areas were experiencing rising or steady displacement pressure, it is estimated that the share of STRs are likely to increase in market clusters E and G (where homeownership rates are less than 40%, **Figure 7**) if City land use policies do not limit their location and development. This data does not differentiate between CSTRs and NSTRs, so the conclusions drawn from this study are only broadly applicable to STR uses in general.

4.6 Eviction and Poverty Data Trends Citywide, Generally

Trends in eviction and poverty data can also shed light on displacement risk across the City. This data is tracked by several organizations both locally and nationwide. Eviction Lab[56] has tracked eviction filings across the City from 2020 to 2024. **Table 19** summarizes this data and highlights a notable increase in evictions from 2020 to 2023, with a slight decline in 2024. This increase could be a result of a number of factors, including the proliferation of STRs, or could be reflective of a drop from the normal rate of evictions during the pandemic.

During the pandemic many local jurisdictions utilized federal emergency funds to subsidize rent and halt evictions associated with renters' inability to pay their rent to avoid a housing crisis. In this regard, the uptick in 2022 could reflect a release on this hold and the conclusion of rental subsidies associated with the pandemic recovery phase. Regardless, it is important to note that the increase in eviction filings (while not directly tied to STRs in this dataset) does coincide with the city-wide increase in STRs since the pandemic. However, the eviction numbers are higher in 2021 through 2024 as compared to 2017-2018, while the STR permit numbers are lower from 2021 to 2024 than they were prior to the pandemic. Additionally, this data does not track situations where leases were not renewed due to conversion into STRs that did not go through a formal eviction process. Further, eviction filings do not automatically result in an eviction.

[56] Princeton University. (2018). *The Eviction Lab.* Maps and Data. https://evictionlab.org/

TABLE 19: EVICTION FILINGS, 2020-2024[57]

YEAR	EVICTION FILINGS
2017	2,460
2018	2,586
2019	-
2020	3,071
2021	3,114
2022	5,796
2023	5,950
2024	5,074

When analyzing poverty rates citywide (**Table 20**), both pre- and post-pandemic, a similar relationship is established and cannot be conclusively associated with STRs. Where, according to the U.S. Census Bureau, between 2013 and 2017, 25.4% of people in New Orleans lived below the poverty level. This decreased to 22.9% of people between 2018 and 2022[58] during the pandemic, when many in poverty were receiving federal subsidies to support daily life activities. Post pandemic 2023 American Community Survey 1 Year Estimates illustrated a return to pre-pandemic poverty, with a slight increase to 26.2% of the population living below the poverty level[59]. This increase could reflect the conclusion of pandemic related subsidies or a slight (but real) increase in poverty city-wide.

Some view transient lodging uses as a land use that can cause gentrification, remove generational wealth, and make non-residents wealthier, while increasing poverty. Since the poverty rate is not significantly different (percent change of 0.8%), this argument is not validated through assessing poverty data.

TABLE 20: CITY OF NEW ORLEANS U.S. CENSUS DATA, 2013-2023

	2013-2017	2018-2022	2023
Income Below the Poverty Level			
Total people with income in the past 12 months below the poverty level	25.4%	22.9%	26.2%

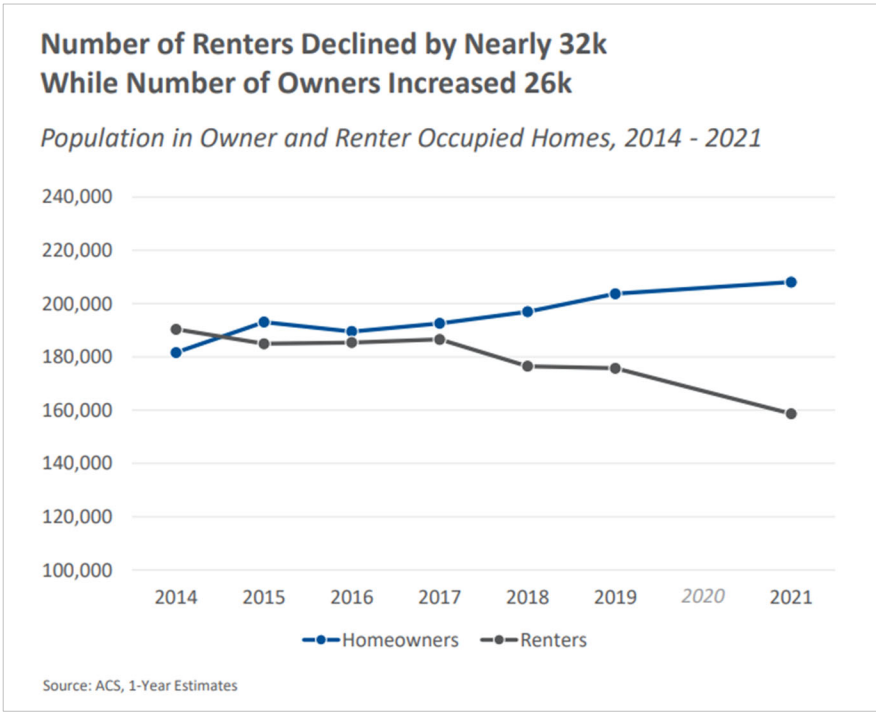
[57] Ibid.
[58] U.S. Census Bureau. (2022). Comparative Economic Characteristics. *American Community Survey, ACS 5-Year Estimates Comparison Profiles, Table CP03*. Retrieved January 22, 2025, from https://data.census.gov/table/ACSCP5Y2022.CP03?q=new orleans, la&d=ACS 5-Year Estimates Comparison Profiles.
[59] U.S. Census Bureau, U.S. Department of Commerce. (2023). Poverty Status in the Past 12 Months by Age. *American Community Survey, ACS 1-Year Supplemental Estimates, Table K201701*. Retrieved January 22, 2025, from https://data.census.gov/table/ACSSE2023.K201701?q=new orleans, la&d=ACS 1-Year Supplemental Estimates.

4.7 A Decline in Rental Units Citywide and Eviction Trends by Neighborhood

Over the years, many have pre-supposed that STRs have manifested most readily from the conversion of existing rental units to STR units. Understanding the shift in total renters and homeowners in the City over time can help to understand if—in fact—the City is losing rental units and potentially the affordable housing options they provide to area residents to STR conversions.

The Reinvestment Fund analyzed Housing Occupancy from 2014 to 2021, when the City experienced the most significant increase in STRs. Their analysis confirms a significant loss of rental units (> 40,000 units) over the years, shown in **Figure 16** as a growing gap between renters and owners from 2014 to 2021 in the City. In that time period, homeownership rates increased, and renter occupied homes experienced a significant drop before the pandemic (2017-2018) and during the pandemic (2019-2021).

FIGURE 16: NUMBER OF RENTERS VS. HOMEOWNERS, 2014-2021[60]



Census Data from 2013 – 2023 (**Table 21**) further demonstrates the growing gap between owner-occupied units and renter occupied units across the City, where in 2023, owner-occupied units comprised 55.9 % of housing units, and renter occupied units comprised 44.1% of housing units.

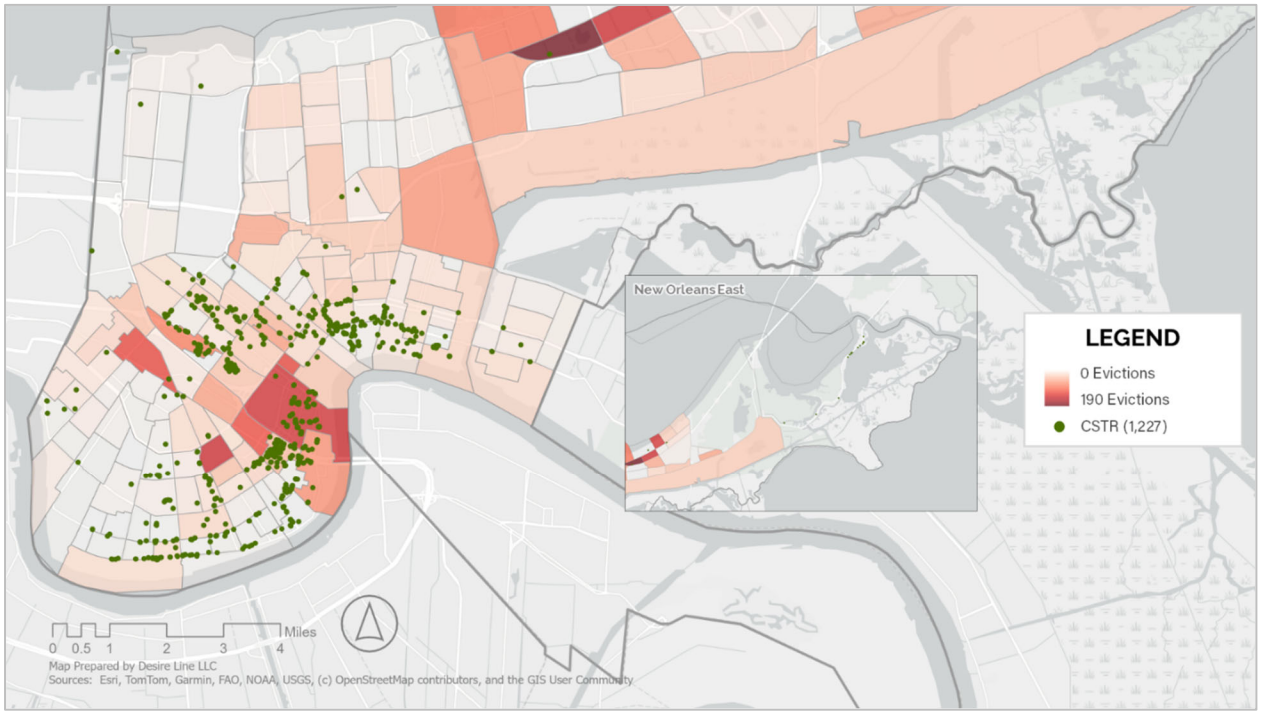
[60] The Reinvestment Fund. (2023, October 9). *Market Value Analysis: New Orleans MVA*. The Reinvestment Fund. https://www.reinvestment.com/wp-content/uploads/2021/11/New-Orleans-MVA-Presentation-10.9.23.pdf.

TABLE 21: CITY OF NEW ORLEANS U.S. CENSUS DATA, 2013-2023

	2013-2017	2018-2022	2023
Housing Units			
Owner-Occupied Units	47.1%	49.3%	55.9%
Renter-Occupied Units	52.9%	50.7%	44.1%

Assessing eviction trends by neighborhood, in light of increasing displacement risks and pressures, helps to capture the development environment and circumstances that may be contributing to lower renter occupied housing unit rates. **Figure 17** is a map of where current CSTRs are located with census blocks highlighted to show the number of recorded evictions in the last year.

FIGURE 17: CTSRs AND EVICTION DATA



There is some significant overlap of CSTRs permits and evictions in the last year, specifically within the Marigny, Bywater, Warehouse District, Lower Garden District, and Central City neighborhoods. The Warehouse District, Lower Garden District, and Central City neighborhoods all contain zoning districts that permit CSTRs.

Princton University highlights a significant increase of evictions in the areas where there is a high concentration of CSTRs when comparing to pre-pandemic rates of eviction. Relative to the average rate, **Table 22** shows the percentage increase (as compared to the pre-COVID average) in these areas.[61]

[61] Princeton University. (2018). *The Eviction Lab.* Eviction Tracking: New Orleans, Louisiana. https://evictionlab.org/eviction-tracking/new-orleans-la/.

TABLE 22: EVICTION INCREASE BY NEIGHBORHOOD[62]

NEIGHBORHOOD	EVICTION INCREASE %
Marigny	150%
Bywater	190%
Warehouse District/LGD	371%
Central City	69%

Within these "hotspot" neighborhoods, the percentage of occupied housing units also decreased during the same time period. **Table 23** shows the number of occupied housing units in each neighborhood between 2000 and 2020.[63] STRs are not considered an occupied housing unit by the U.S. Census Bureau, as they are considered to be a seasonal, recreational, or occasional use.

TABLE 23: OCCUPIED HOUSING UNITS BY NEIGHBORHOOD

NEIGHBORHOOD	2000	2020
Marigny	83.3%	64.2%
Bywater	83.0%	75.2%
Warehouse District	78.5%	58.9%
LGD	82.6%	68.3%
Central City	78.8%	69.9%

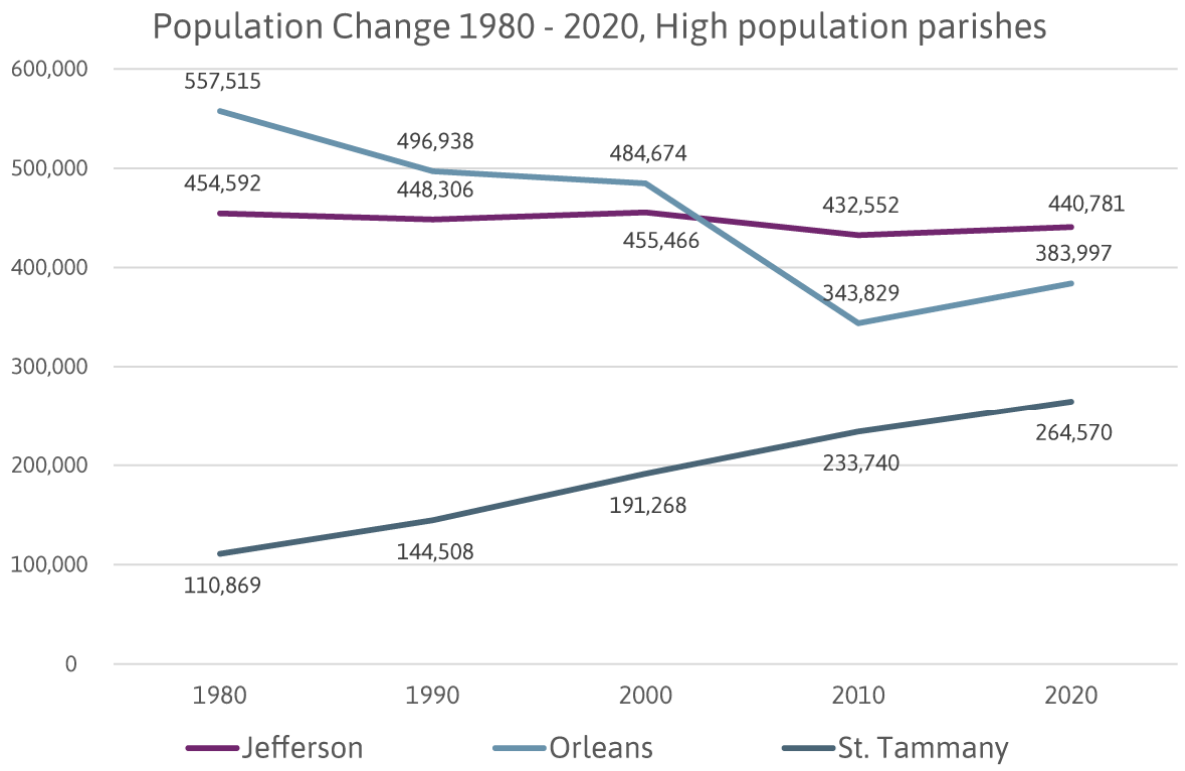
4.8 Population Change

With owner-occupied units outpacing rental units, limited housing affordability city-wide, and many residents across the city facing rising or steady displacement risk and pressure, full time residents may find affordable housing difficult to find.

From 2000 to 2020, New Orleans lost over 100,000 of its residents due to a myriad of reasons. Changing population trends in the City produced by The Data Center (**Figure 18**), and in the research by the Reinvestment Fund in **Section 4.5**, could indicate a need to increase permanent housing units, increase housing affordability, and stabilize housing markets in what is still a post-Katrina (2005) recovery economy. Hurricane Katrina's landfall in 2005 and devastating effect on the City's housing market caused a significant decrease in population, but the City began losing population prior to the storm's impact.

[62] Ibid.
[63] The Data Center. (2025). *Data Resources.* Neighborhood Statistical Area Data Profiles. https://www.datacenterresearch.org/data-resources/neighborhood-data/

FIGURE 18: POPULATION CHANGE 1980-2020[64]



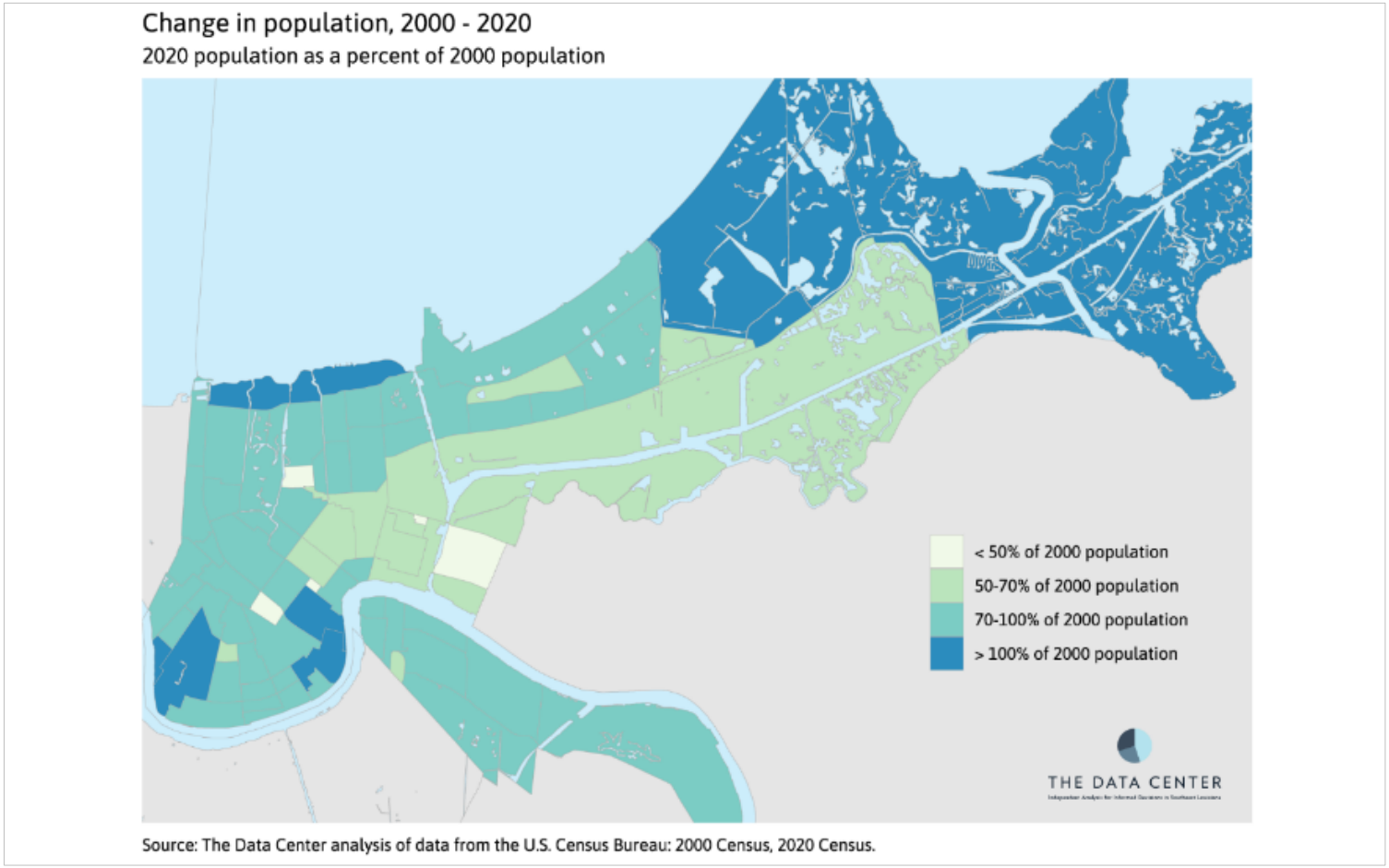
Source: The Data Center analysis of data from the U.S. Census Bureau: 1980 - 2020 Decennial Census

As residents seek relief from citywide housing market pressures and challenges, commuting from nearby Jefferson and St. Tammany parishes becomes an alternative housing option. From 1980 to 2020, the City's population decreased by 173,518 people; while St. Tammany Parish's population gained 153,701; and Jefferson Parish remained fairly steady from 1980 to 2020, losing only 13,811 people (**Figure 18**).

While the City's total population declined from 2000 to 2020, certain areas, such as high income, tourist heavy neighborhoods including the CBD, Lower Garden District, Audubon, Black Pearl, Lakeshore-Lake Vista, and Lake Terrace and Oaks, and middle-class residential areas, including the Lower Ninth Ward and New Orleans East, increased in population (Figure 19).

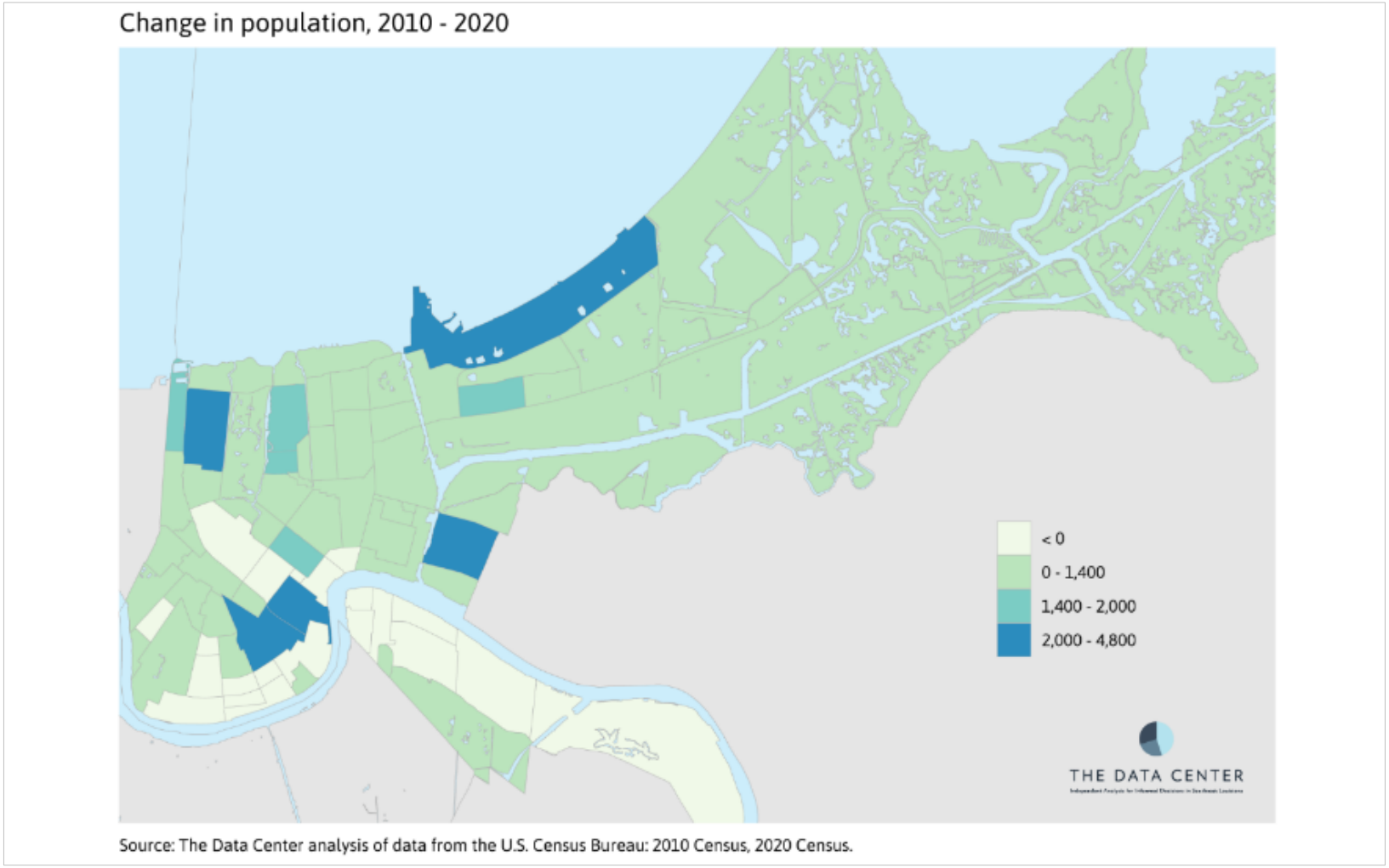
[64] Plyer, A. (2021, October 25). *Population Shifts Across Metro New Orleans.* The Data Center. https://www.datacenterresearch.org/reports_analysis/population-shifts-across-metro-new-orleans/.

FIGURE 19: CHANGE in POPULATION, 2000-2020[65]



[65] Plyer, A. (2021, October 25). *Population Shifts Across Metro New Orleans.* The Data Center. https://www.datacenterresearch.org/reports_analysis/population-shifts-across-metro-new-orleans/.

FIGURE 20: CHANGE in POPULATION, 2010-2020[66]



Source: The Data Center analysis of data from the U.S. Census Bureau: 2010 Census, 2020 Census.

[66] Plyer, A. (2021, October 25). *Population Shifts Across Metro New Orleans.* The Data Center. https://www.datacenterresearch.org/reports_analysis/population-shifts-across-metro-new-orleans/.

4.9 Conclusions

There is increased redevelopment activity occurring across the City, evidenced by the infill development and housing sales, but this increased development activity is not resulting in an increased local population, nor improvements to the short- and long-term renter and owner-occupied units across the city.

STRs do limit available long-term housing opportunities and do not improve the City's existing, substantial housing affordability challenges. This is largely due to STR concentrations in competitive housing markets, where these land uses occupy the same spaces or units that would otherwise support more long-term housing opportunities through home ownership or rental units.

5. Comparison to Other Cities

5.1 STR Growth in Comparable Cities.

As the City's total number of STRs has grown over the years, so too have STRs in comparable US cities. In 2024, Inside Airbnb reported 7,118 Airbnb listings in New Orleans (compared to 10,567 listings reported by Granicus); 5,221 listings in Dallas, 7,953 listings in Chicago, and 8,995 listings in Nashville. The population of New Orleans is 362,701, while the population of Dallas is 1.3 million, Chicago is 2.7 million, and Nashville is 684,061. With the lowest population, New Orleans has a similar number of listings compared to the other cities. This data helps establish a general trend in the STR market and reveals that STRs in New Orleans are generally aligned to other cities with similar markets, but with higher number compared to city size. *It is important to note that Inside Airbnb does not characterize whether these rentals are commercial or residential in nature and could include both permitted and illegally operating units.*

5.2 Updates to Previous City STR Study Community Comparisons

This section examines current CSTR regulations in the municipalities that previous City studies initially researched and that have been amended based on lessons learned over time. The City Planning Commission's 2016 Rental Study compared regulations from Austin, Nashville, Philadelphia, and Portland. It also compared fees from Austin, Key West, Nashville, Philadelphia, San Francisco, Savannah, and the State of Wisconsin.[67] The City Planning Commission's 2018 Rental Study further analyzed regulations in Austin, Boston, Charleston, Chicago, Nashville, New York, San Antonio, San Francisco, Santa Monica, and Savannah.[68] The City Planning Commission's 2019 Rental Study compared regulations in Boston, Nashville, Pacific Grove, Seattle, and San Antonio.[69] A 2023 Study by the Jane Place Neighborhood Sustainability Initiative investigated rental regulations in Honolulu, Irvine, Jefferson Parish, and Las Vegas.[70] *As previously mentioned in, it is important to note that this analysis defines Commercial rentals as occupied units leased for less than 30 days by any agent for income.*

[67] Kindel, Nicolas, et al. (2016). *Rental Study.* City Planning Commission, City of New Orleans. https://nola.gov/next/city-planning/topics/major-studies-projects/2015-short-term-rental-study/.
[68] Perry, Brooke, et al. (2018). *Rental Study, 2018 Edition.* City Planning Commission, City of New Orleans. https://nola.gov/next/city-planning/topics/major-studies-projects/2018-short-term-rental-study/.
[69] Cramer, Paul et al. (2019). *Rental Study, 2019 Edition*. City Planning Commission, City of New Orleans. https://nola.gov/next/city-planning/topics/major-studies-projects/2019-short-term-rental-study/.
[70] Jane Place Neighborhood Sustainability Initiative. (2023). *Short-Term Rentals, Long Term Impacts 2.0: The Continued Corrosion of Housing Access and Affordability in New Orleans.* jpnsi.org.

A number of jurisdictions only permit owner-occupied STRs, which effectively prohibit CSTRs by exclusion. They include Boston, Jefferson Parish, Las Vegas, New York City, Philadelphia, Portland, San Francisco, and Santa Monica. In summary, CSTRs are permitted in Austin, Charleston, Chicago, Honolulu, Irvine, Key West, Nashville, Pacific Grove, San Antonio, Savannah, Seattle, and Wisconsin. **Table 24** provides classification, requirements, and restrictions for jurisdictions that permit CSTRs. Where permitted, these jurisdictions enforce various CSTR permitting requirements, including 24-hour site managers, building and fire code compliance, licenses and certificates, registration and payment of taxes, liability and property insurance, retention of records, as well as renewal requirements. Many jurisdictions enforce additional restrictions, such as density caps, prohibitions on building types, requirements on length of time, and zoning restrictions. Five of the cities also enforce regulations applicable to the STR host platforms, requiring the platforms to review advertisements and provide reports to the local government agency. These regulatory examples provide a variety of CSTR policy frameworks for Study consideration.

TABLE 24: 2024 COMMERCIAL SHORT TERM RENTAL COMPARISONS

LOCATION	CLASSIFICATION	REQUIREMENTS	RESTRICTIONS
Austin	Type 2 (entire dwelling) Type 3 (condo)	• 24 hour site manager • Agent Authorization Form • License: Code Compliance • Certificate of Occupancy • Neighborhood notification letter • Property Insurance • Renewal: annual • Tenant requirements posted on site	***Density cap:*** Percentage of Census Tract, Type 2: 1 per census tract, Type 3: 1 per property ***Time:*** < 30 days
Charleston	Commercial Rentals	• License: Business • Off-street parking	***Density cap:*** No more than 9 on one lot ***Prohibitions:*** Signs, other commercial uses associated with the rental ***Zoning:*** Rental Overlay Zone only
Chicago	Vacation Rental	• Include license number on online platforms • HOA approval • Liability insurance • License: each unit • Maintenance and furnishing requirements • Property Insurance • Records retention	***Density cap:*** 6 or fewer sleeping units, no more than 6 units per building, no more than 1 person per 125 sq ft ***Prohibitions:*** SROs, B&Bs, hotels, month-to-month rental units, corporate housing ***Time:*** Cannot rent by the hour or for less than 24 consecutive hours, or more than once within any consecutive 24 hour period
Honolulu	Transient Vacation Units	• Provide buyers with Rental disclosure form • Registration • Renewal: Annual	***Density cap:*** Maximum 2 adults per room ***Grandfathering:*** Allowed ***Time:*** < 30 days ***Zoning:*** Resort-zoned areas and a couple apartment-zoned areas only

LOCATION	CLASSIFICATION	REQUIREMENTS	RESTRICTIONS
Irvine	Rentals	• Permit • Tax: Transient Occupancy Tax	***Hosting platform rules:*** Prohibited from booking, provide listing information to City if posted ***Zoning:*** Hotel-motel zones only
Key West	Transient Lodging	• 24 hour site manager • Display STR medallion • Inspection: Fire Marshal • License: Transient • Off-street parking • Proof of ownership • Signature of owner(s) • Tax: Sales tax ID number • Tenant registration/lease	***Time:*** < 30 days
Nashville	Rental Property	• 24 hour site manager within 25 mile radius • Code compliance • Floor plan • HOA contact information • Include permit number in online listings • Inspection: Fire Marshal • Liability Insurance • Notarized affidavit • Proof of ownership • Permit: Use Permitted with Conditions (PC) • Renewal: annual	***Density cap:*** Rental to single party, persons to not exceed more than twice the number of sleeping rooms plus four ***Grandfathering***: Allowed in certain zoning districts ***Prohibitions:*** Not within 100 ft of a religious institution, school, playground, park, or day care center ***Time:*** Min: 24 hours, max: 30 days ***Zoning:*** Permitted with conditions in allowed zones only
Pacific Grove	Rental Vacation Rental	• 24 hour site manager • Affidavit of code compliance • Building inspection report • Display placard • Include permit number in online listings • License: STR • Neighborhood notification letter • On-site parking • Proof of ownership • Records retention • Renewal: annual • Tax: Transient Occupancy Tax	***Density cap:*** Lottery system (max: 250), only 2 persons per bedroom, one unit per parcel, 55 foot buffer between units ***Zoning:*** Coastal and Commercial areas only
Savannah	Vacation Rental	• Certificate: Business Tax, Vacation Rental	*Owner-occupied exempt* ***Density cap:*** 2 guests per bedroom, 20% of parcels in each ward ***Grandfathering:*** Allowed ***Time:*** < 30 days

LOCATION	CLASSIFICATION	REQUIREMENTS	RESTRICTIONS
			Zoning: Vacation Rental Overlay District only, no change in appearance of property
Seattle	Rental	• Certificate: Business License Tax • Code compliance • Include license number in online listings • License: Transient Accommodation • Post safety information and owner's number on site • Renewal: annual • Rental registration and inspection	***Density cap:*** 2 units only (primary residence plus secondary unit) ***Grandfathering:*** Allowed ***Hosting platform rules:*** Issue monthly and quarterly reports ***Prohibitions:*** RVs, tents, garages, and boats ***Zoning:*** Downtown Urban Core Only, meet bed and breakfast zoning requirements
Wisconsin	Tourist Rooming House	• Code compliance • Inspections • License: Tourist Rooming House • Maintenance and furnishing requirements • Renewal: annual	***Density cap:*** Up to 4 units, municipalities cannot completely prohibit rentals

The City of New Orleans could consider additional density caps based on number, building type, or neighborhood, prohibitions on the type of CSTRs allowed, additional rules for hosting platforms, or look into a zoning or overlay district particular to CSTRs.

Multiple jurisdictions institute zoning and land use restrictions in addition to use standard requirements and restrictions for Bed and Breakfasts, Hotels and Motels, and other transient lodging uses. These requirements are listed in **Table 25**.

TABLE 25: OTHER TRANSIENT LODGING USE COMPARISONS

LOCATION	CLASSIFICA-TION	ZONING AND LAND USE	REQUIREMENTS/RESTRICTIONS
Austin	**Bed and Breakfast**	• Allowed in some residential districts with conditional use permits	• A person may only own one bed and breakfast • Must be located in the principle residential structure • Must be designed to preserve neighborhood character • Owner must reside in the bed and breakfast, or another residential structure on the lot • Meal service is prohibited unless serving breakfast to overnight guests • Must be over 1,000 ft from existing bed and breakfasts • Maximum 3 units if building is under 50 years old • Maximum 5 units if building is 50+ years old • Restrictions on altering the exterior
	Hotel/Motel	• Permitted in commercial, downtown mixed use, and mixed use combined districts • Conditionally permitted in some districts	• Compatibility standards in some districts to ensure area character preservation • Subject to safety, structural maintenance, sanitation, and fire codes • Regular inspections are required
Boston	**Bed and Breakfast**	• Conditionally permitted in all Roxbury Neighborhood District subdistricts as well as Mission Hill Neighborhood subdistricts	
Boston	**Hotel/Motel**	• Small hotels conditionally permitted in smaller mixed-use district, permitted in medium and large-scale mixed-use districts • Large hotels conditionally permitted in large-scale mixed-use districts, and neighborhood mixed use district, permitted in general business district • Apartment Hotel conditionally permitted in neighborhood district and residential subdistricts	
Charleston	**All Transient Lodging**	• All permitted in Accommodations Overlay Zones and on occasional special exception use in the Gathering Place district	• Exceptions can be made outside of the Accommodations Overlay when 20 criteria are met • Accommodations must be 10 or more beds

LOCATION	CLASSIFICA-TION	ZONING AND LAND USE	REQUIREMENTS/RESTRICTIONS
			• Full service hotels (150+ units) must have an onsite restaurant, concierge, laundry, spa, and other amenities available • Must contribute to City of Charleston Workforce / Affordable Housing account when obtaining occupational license ($5.10 per sq ft) • There may not be more than 8 full service hotels on the peninsula at once • In areas outside of the overlay, accommodations must provide shuttle service to the Historic District, if over 50 beds
	Bed and Breakfast	• All approved, legal bed and breakfasts in operation outside of the Overlay Zone are issued a Category 1 or Category 2 STR Permit, depending on their location • Bed and breakfasts can be an accessory use if outside of the Old/Historic Districts and all other requirements are met	
Chicago	**Bed and Breakfast**	• Permitted in all business and commercial districts except for commercial, manufacturing and employment district	• Must be located above the ground floor in those zoning districts in which dwelling units and other residential uses are not permitted (by right) on the ground floor • Residential buildings cannot be more than 4 stories in height, occupied by the owner, and where 11 or fewer rooms are rented out to guests for 31 consecutive days or fewer • Must obtain bed and breakfast license
	Hotel/Motel	• Not permitted in neighborhood and mixed-use districts, special use approval required in higher density neighborhood district and all commercial districts • Permitted in all downtown districts except for downtown residential	
Honolulu	**Bed and Breakfast**	• Permitted subject to use standards in apartment districts and resort districts • Guest house permitted in large lot residential district if approved as a special accessory use	• Guest house permitted when lot size is minimum 20,000 sq ft

LOCATION	CLASSIFICA-TION	ZONING AND LAND USE	REQUIREMENTS/RESTRICTIONS
	Hotel/Motel	• Permitted in resort district and conditionally permitted in business mixed use district and intensive industrial district • Hotels with more than 180 units require a Conditional Use Permi	• When in business mixed use or intensive industrial district, must be within 0.5 miles from the entrance of the airport, front major or secondary street or highway, have a minimum lot area of 15,000 sq ft, one parking spot per 2 units, and conform with sign standards • In the business mixed use district, must be located within designated plan areas, multi-family and hotel uses cannot be on the same floor, and cannot be used as a time share or transient vacation unit
	Timeshare	• Permitted in apartment district with specific standards	• Must be located within 3,500 ft of a resort district of greater than 50 contiguous acres • Resort district and apartment district required to be rezoned on the same zone change application as part of a master planned resort community
Irvine	**Hotel/Motel**	• Conditionally permitted in community commercial district, mixed use, multi-use and medical and science districts • Permitted in regional commercial district	
Jefferson Parish	**Bed and Breakfast**	• Permitted in residential and mixed-use districts	• 24 hour free emergency phone access to the front desk and 911 services • Hard-wired smoke detector(s) and hardwired carbon monoxide detector in either guest rooms or adjacent hallways • Operable fire extinguisher required to be located on the premises. • Supervised by manager at all times • Regular maintenance by a pest control company • Sheriff's Office conducts inspections • No kitchens in guest rooms • No external evidence that it is a bed and breakfast except one small sign
	Hotel/Motel	• Permitted in commercial districts	• Hotel occupancy tax (1%) and collection fee of up to 11% • Must be supervised by manager at all times • Regular maintenance by a pest control company • Hotels must maintain suburban character
Key West	**Bed and Breakfast**	• Permitted in historic and mixed-use zones	

LOCATION	CLASSIFICA-TION	ZONING AND LAND USE	REQUIREMENTS/RESTRICTIONS
	Hotel/Motel	• Permitted in commercial and mixed-use zones	• Any new commercial industrial hotel/motel shall be required to provide affordable housing or pay fees in lieu to the Housing Trust Fund • Bars and lounges accessory to and located within a motel, hotel, or other transient facility having at least 20 units • Units go towards hurricane evacuation calculations
	Timeshare	• Permitted in commercial and tourist-oriented zoning districts	
Las Vegas	**Bed and Breakfast**	• Category was deleted in 2017	• All transient lodging is subject to a transient lodging tax
	Hotel/Motel	• Permitted in some commercial and mixed-use districts	• Temporary lodging means a rental period of no more than 1 week • One parking space per guest room • All transient lodging is subject to a transient lodging tax
	Timeshare		• Development must consist of a minimum of 50 units that are made available for timeshare, leasehold, or similar interest • May not serve as primary residence • No accessory use other than from within the time-share development • No exterior advertising • Parking: one space per unit, plus 10 spaces for each 1,000 sq ft of accessory uses
Nashville	**Historic Bed and Breakfast Homestay**	• Only permitted if in an overlay district except in downtown district	
	Rural Bed and Breakfast Homestay	• Permitted by special exception with BZA approval in agricultural districts	• 5 or more acres • Owner occupied • Must submit guest register to zoning administrator yearly • Fire marshal approval required
	Bed and Breakfast Inn	• Permitted and conditionally permitted in commercial, mixed use, office, and shopping center districts • Permitted in downtown districts	• No more than 10 guest rooms
	Hotel/Motel	• Permitted in shopping center, downtown, commercial, office and mixed-use districts	• 6% hotel occupancy tax • Parking: 1 space per room and 1 space per 2 employees

LOCATION	CLASSIFICATION	ZONING AND LAND USE	REQUIREMENTS/RESTRICTIONS
New York City	**Bed and Breakfast**	• Permitted as an accessory use where residential development is permitted as long as specific criteria is met	• Accessory uses to residential structures • Not considered a tourist accommodation when it has been used as a single-family dwelling for 5 years prior to conversion • No more than 5 sleeping rooms for accommodating up to 10 transient lodgers • No sleeping rooms for transient lodgers above the second story above grade • Allowed to be a conversion from a single-family dwelling • Structures with more than 3 bedrooms, no more than 50% of bedrooms and no more than 5 bedrooms total available to lodgers • Fire safety notice post and automatic sprinkler systems required
	Hotel/Motel	• Commercial (permitted and conditionally permitted) • Permitted when part of a building is in a commercial district and goes over the line into a specific residential district • Conditionally permitted in light manufacturing district	• Commercial: shall be located in whole or part within a 1,000 ft radius of the entrance or exit of a limited access expressway, freeway, parkway, or highway (cannot cause undue vehicular or pedestrian traffic), use cannot impair future use of development of the surrounding area • Cannot impair the essential character/streetscape for future development or use • Conditional permit to convert specified floor area from residential to transient hotel use • Must have 24 hour desk service, housekeeping, bellhop, and laundering of linens • Allowed to be a mixed-use building (residential and hotel use)
	Timeshare		• New York State requires a cooling off period of 7 days
Pacific Grove	**Bed and Breakfast**	• Conditionally permitted in more dense residential • Special use permit for commercial districts	• Residential property for commercial lodging purposes • At least 8 rooms available to guests • Principle buildings must be constructed at least 75 years prior to the date of application for the use
	Hotel/Motel	• Permitted in light commercial and hotel district	• 6 or more guest rooms • 12 total commercial uses permitted in the district
	Timeshare	• Prohibited	

LOCATION	CLASSIFICA-TION	ZONING AND LAND USE	REQUIREMENTS/RESTRICTIONS
Philadelphia	**Bed and Breakfast**	• Conditional use in some residential districts	• 10 or fewer bedrooms • Must be operated by the owner of the building, who lives on the property • 4 or fewer guest rooms when located in a residential district • Cannot be leased for events open to non-guests • When a lot abuts an alley or shared driveway with a width of 12+ ft, access to guest parking spaces must come from the alley or shared driveway
	Visitor Accommodations	• Permitted in residential mixed use, higher intensity neighborhood commercial, and industrial residential mixed-use districts	• Not allowed within 1,000 ft of a residential zoning district in commercial district
Portland	**Bed and Breakfast**	• Operate as existing nonconforming uses	• A bed and breakfast operating prior to 1988 that did not receive a revocable permit (issued prior to 1991) can continue to operate as an approved conditional use • Cannot expand or alter the building unless approved through a conditional use review
	Hotel/Motel	• Permitted or need CUP in areas that allow Retail Sales and Services, mainly in commercial/mixed use zones	• Use standards are specific to vehicle and bike parking
San Francisco	**Hotel/ Tourist Units**	• Conditionally permitted in higher density residential districts	• Rented out for less than 32 days • 6 or more guests • New ordinance (not posted yet) allowing for some level of interim housing in hotels and motels • Subject to Planning and Entertainment Commission review • All transient lodging subject to 14% hotel tax
	Motel		• Guest rooms independently accessible from the outside • Entrance must be immediately accessible from a major thoroughfare (designated by general plan) • Subject to Planning and Entertainment Commission review
	Timeshare	• Permitted only in specific buildings throughout the City	

LOCATION	CLASSIFICA-TION	ZONING AND LAND USE	REQUIREMENTS/RESTRICTIONS
	Bed and Breakfast	• Conditionally permitted in single unit residential districts (in designated landmarks only), ocean park neighborhood and ocean front districts (within designated landmarks only), and downtown districts • Minor use permit in commercial and mixed-use districts	• Property owner/manager lives on site • Up to 4 bedrooms • Must be located and operated in a single unit dwelling that conforms with the minimum size in the permitted district, unless it is a landmark structure. • No more than 2 rooms may be rented • If the floor area of the structure exceeds 4,000 sq ft, 4 rooms may be rented • Cannot be rented for over 15 days
Santa Monica	**Hotel/Motel**	• Prohibited in beach overlay district • Conditionally permitted in high density residential, highest intensity ocean park neighborhood district, Bergamot area, and civic center district • Minor use permit in downtown districts (5,000 sq ft or less) • Existing uses conditionally permitted in in commercial and mixed-use districts	• Multiple policies to support hotel workers (change of ownership protection, fair compensation, public housekeeping training program, etc.) • When a major addition is added, hotel/motel are required to install solar panels • New construction must include electric vehicle charging • 30 days or less • Must maintain hotel register • New developments subject to either on site or offsite affordable housing requirements in the downtown district
Savannah	**Bed and Breakfast Homestay**	• Limited use in large lot residential, historic residential, downtown historic, and business districts	• Owner occupied • Maximum 1 bedroom with 2 adults • Only sleeping accommodations (no kitchen or private bathroom required)
	Bed and Breakfast	• Limited use in residential, commercial, business, and downtown districts	• Owner-occupied, single-family dwelling that provides 2-5 bedrooms • Number of occupants shall not exceed fire code • In historic residential district, no more than 4 guest rooms (unless special use permit is granted, then up to 6)
	Inn	• Limited uses in some residential mixed use, downtown, and industrial districts	• 6-15 guest rooms • Must be owner occupied or provide 24/7 staff • Except within downtown commercial, central business, business mixed use districts, use must front collector or arterial streets (unless it is an existing use) • On premise uses allowing general public must be allowed in base zoning district • Additional standards/restrictions if serving alcohol

LOCATION	CLASSIFICA-TION	ZONING AND LAND USE	REQUIREMENTS/RESTRICTIONS
	Hotel/Motel (16-74 rooms)	• Permitted in hotel development overlay (small) (same boundaries as Historic District) • Permitted in some downtown, mixed use, business, and commercial districts	• New hotels only permitted in designated areas of the historic district • New hotels must be located on a designated street • Single family structures cannot be converted to hotels if they are identified on the historic buildings map (if a historic building was used as a hotel and converted to another use, it can be re-established as a hotel) • Any on premise use only accessible to guests is an accessory use
	Hotel/Motel (75 or more rooms)	• Permitted in hotel development overlay (large) (same boundaries as Historic District)	• New hotels only permitted in designated areas of the historic district • New hotels must be located on a designated street • Single family structures cannot be converted to hotels if they are identified on the historic buildings map (if a historic building was used as a hotel and converted to another use, it can be re-established as a hotel)
Seattle	**Bed and Breakfast**	• Permitted in neighborhood residential and multi-family districts	• Must be operated by the primary resident no more than 5 guest rooms (if established after 1987) • Must be located in a dwelling unit or an accessory dwelling unit • License required and must also file a platform application • Operators can only have one bed and breakfast license • Operators must also have an STR license if listing is on STR platforms
	Hotel	• Permitted in downtown district, mixed use (must be above 85 ft), and special review district (must be above street level)	• Limited districts allow hotels to have an extra floor for residential use • 6 or more guest rooms
	Motel	• Considered an automobile-oriented use, prohibited in all districts	
Wisconsin	**Bed and Breakfast**	• All lodging is regulated by the Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP)	• Must provide 8 or fewer rooms for rent to no more than 20 tourists for more than 10 nights in a 12 month period • Must be the owner's personal residence, and occupied by the owner at the time of the rental

LOCATION	CLASSIFICA-TION	ZONING AND LAND USE	REQUIREMENTS/RESTRICTIONS
			• May only offer a pool if it is a licensed public pool
	Hotel	• All lodging is regulated by the Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP)	• 5 or more rooms, and all related rooms, buildings and areas • License from July 1 to June 30 • Required to pay annual license fee and one time pre-inspection fee (based on number of rooms)
	Motel	• All lodging is regulated by the Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP)	• A hotel that furnishes on-premises parking for motor vehicles of guests as part of the room charge, without extra costs, and is identified as a motel rather than a hotel at the request of the operator • License from July 1 to June 30 • Required to pay annual license fee and one time pre-inspection fee (based on number of rooms)

As seen in **Table 25**, the City of New Orleans could apply zoning restrictions, overlay districts, additional licenses and taxes, and even worker requirements to Bed and Breakfasts, Hotels and Motels, and other transient lodging uses. Additionally, the City could institute even more regulations related to parking, operations, and safety.

5.3 Impacts of STRs vs. Bed and Breakfasts and Hotels

A recent study conducted by Tulane University examining the impacts of Mardi Gras on the City of New Orleans found that average room occupancy in 2023 during Mardi Gras was less than it was in 2014, although more than 2020 and 2022 (**Figure 21**). While the average occupancy has decreased over a ten year period, the number of rooms occupied and the total revenue received increased. The study did not include an analysis of STRs and notes that these transient lodging uses could be providing lodging to tourists more frequently since 2014.[71] However, as Bed and Breakfasts and Hotels and Motels continue to be permitted by the City at a consistent rate, it does not seem as if STRs are impacting demand for other transient lodging uses. It is important to examine the land use and regulatory procedures for all transient lodging uses to understand the impacts of Short Term Rentals.

[71] Weiss, T. L. (2024, January). *New Orleans 2023 Mardi Gras Season*. Department of Economics, Tulane University. https://tulane.app.box.com/s/m1t5mjrl8n2xbu2urkgouo6dq9jukg1v

FIGURE 21: MARDI GRAS TO MARDI GRAS COMPARISON

MARDI GRAS-TO-MARDI GRAS COMPARISON; YEAR OVER YEAR

Year Mardi Gras	2023 February 21st				2022 March 1st				2020 February 25th				2014 March 8th			
	Date	Average Occupancy	# of rooms occupied	Total Revenue	Date	Average Occupancy	# of rooms occupied	Total Revenue	Date	Average Occupancy	# of rooms occupied	Total Revenue	Date	Average Occupancy	# of rooms occupied	Total Revenue
Thursday	Feb. 9th	81.5%	20,621	$4,689,811	Feb. 17th	65.4%	20,437	$5,256,836	Feb. 13th	75.6%	14,570	$2,695,452				
Friday	Feb. 10th	86.5%	21,881	$6,156,348	Feb. 18th	81.6%	21,710	$5,736,899	Feb. 14th	93.3%	17,977	$4,450,540	Feb. 25th	86.83%	21,102	$3,030,501
Saturday	Feb. 11th	82.3%	20,821	$5,679,259	Feb. 19th	86.6%	16,277	$3,191,613	Feb. 15th	97.5%	18,797	$4,831,360	Feb. 26th	96.50%	23,452	$3,578,835
Sunday	Feb. 12th	56.5%	14,296	$2,818,133	Feb. 20th	64.8%	12,405	$2,281,982	Feb. 16th	70.5%	13,585	$2,387,976	Feb. 27th	57.40%	13,950	$1,795,215
Monday	Feb. 13th	51.1%	12,927	$2,410,658	Feb. 21st	49.4%	12,539	$2,265,426	Feb. 17th	62.5%	12,040	$1,987,386	Feb. 28th	65.80%	15,991	$2,215,765
Tuesday	Feb. 14th	54.7%	13,846	$2,553,817	Feb. 22nd	50.0%	12,416	$2,283,120	Feb. 18th	67.6%	13,024	$2,213,165	Mar. 1st	70.20%	17,061	$2,359,325
Wednesday	Feb. 15th	56.1%	14,199	$2,822,979	Feb. 23rd	49.4%	14,997	$3,653,925	Feb. 19th	66.3%	12,788	$2,211,296	Mar. 2nd	69.00%	16,769	$2,256,111
Thursday	Feb. 16th	68.0%	17,204	$4,457,192	Feb. 24th	59.6%	20,473	$7,110,992	Feb. 20th	70.3%	13,543	$2,820,012	Mar. 3rd	70.50%	17,134	$2,472,381
Friday	Feb. 17th	91.7%	23,199	$9,465,349	Feb. 25th	81.8%	21,991	$8,345,962	Feb. 21st	95.4%	18,386	$5,915,835	Mar. 4th	91.90%	22,334	$4,228,583
Saturday	Feb. 18th	95.3%	24,113	$10,716,839	Feb. 26th	87.6%	19,241	$5,938,689	Feb. 22nd	97.8%	18,845	$6,955,073	Mar. 5th	96.60%	23,477	$4,696,279
Sunday	Feb. 19th	91.2%	23,074	$8,536,662	Feb. 27th	76.6%	18,130	$4,592,627	Feb. 23rd	90.8%	17,502	$5,100,101	Mar. 6th	92.60%	22,505	$4,439,028
Monday	Feb. 20th	86.6%	21,895	$6,554,710	Feb. 28th	72.1%	16,270	$3,800,839	Feb. 24th	89.7%	17,290	$4,276,935	Mar. 7th	92.30%	22,432	$4,013,699
Tuesday	Feb. 21st	79.5%	20,100	$5,306,266	March 1st	64.8%	11,896	$2,072,508	Feb. 25th	82.0%	15,811	$3,541,939	Mar. 8th	80.80%	19,637	$3,144,837
Wednesday	Feb. 22nd	57.3%	14,503	$2,690,132	March 2nd	47.1%	13,800	$2,604,288	Feb. 26th	60.4%	11,647	$1,894,160	Mar. 9th			
AVERAGE		**74.2%**	**18,763**	**$5,347,011**		**66.9%**	**16,613**	**$4,223,979**		**80.0%**	**15,415**	**$3,662,945**		**80.9%**	**19,654**	**$3,185,880**
TOTAL			**262,679**	**$74,858,155**			**232,582**	**$59,135,706**			**215,805**	**$51,281,230**			**235,844**	**$38,230,558**
% CHANGE REPORTING YEAR TO REPORTING YEAR			**12.94%**	**26.59%**			**7.77%**	**15.32%**			**-21.57%**	**14.97%**				

6. Transient Lodging Land Use Analysis

6.1 Context for Terminology and Land Use Regulatory Regimes

Use standards and conditions

Land use activities and their associated impact to the economy are sorted into categories, assigned a code, and studied consistently across the nation for market research and data collection. Commercial Short Term Rentals, or CSTRs, do not have a specific land use code, and instead fall within a broader land use category sometimes referred to as “transient lodging uses” which include the Land-Based Classification System (LBCS) code "transient living," and the North American Industry Classification System (NAICS) code of "traveler accommodation." These codes include the following land use activities: hotels, motels, tourist homes, Bed and Breakfasts, and other traveler accommodation.

Land uses that are grouped together often share similarities regarding the activities occurring on site and the effect of the use on neighboring properties. Similar uses typically share regulatory standards and review procedures. This alignment supports effective code interpretation, enforcement, and fair market conditions for operators providing similar services. Understanding how CSTRs are similarly regulated to other transient lodging uses can aid in developing land use regulations that both improve code administration and support a stable, competitive housing market.

Zoning district regulatory regime

Zoning, in its most general sense, aims to establish predictable land development patterns across a local jurisdiction in order to enable the efficient and effective review and approval of land development applications and permits consistent with a local Comprehensive or Master Plan’s Vision, Goals and Objectives. The purpose (Sec. 1.2, CZO) of the Comprehensive Zoning Ordinance of the City of New Orleans, includes the following:

"A. To encourage and promote, in accordance with present and future needs, the public health, safety, and welfare of the citizens of the City of New Orleans.
B. To provide for efficiency and economy in the process of development.
C. To provide for the appropriate use of land.
D. To preserve and enhance the value of structures, communities, and neighborhoods that constitute the distinct places within the city.
E. To provide for preservation, protection, development, and conservation of natural resources.
F. To promote the principles of sustainability and resilience.
G. To provide for functional public utilities and facilities, and for the convenience of traffic and circulation of people and goods.
H. To provide for promotion of the civic amenities of beauty and visual interest, for preservation and enhancement of historic buildings and places, and for promotion of large-scale developments as means of achieving unified civic design.
I. To ensure that the policies set forth in City's Master Plan are implemented by the land use regulations and are consistent with the goals set forth in the Master Plan."

There are 71 neighborhoods (according to New Orleans City datasets provided as part of this Study) and 71 base (and sub) zoning districts in the city. Of the 71 zoning districts, 52 currently allow transient lodging uses. These 52 districts and their purpose statements are provided below, while the permitted uses are listed in **Table 26**.

Article 7: Open Space Districts The Open Space Districts provide residents with access to active and passive recreation areas, protect the City's cemeteries, and preserve national resources within the wetlands and coastal areas. In some districts, only limited development is appropriate such as cultural facilities while in other areas the predominant character should emphasize the natural environment.

- **GPD**: The purpose of the GPD General Planned Development District is to provide flexibility in the site design and development of land in order to promote its most environmentally sensitive use and to preserve the natural and scenic qualities of wetlands and other natural land features. The GPD District is intended to provide protection for environmentally sensitive areas and encourage development that avoids or minimizes negative impacts and allows for innovative development techniques and flexibility in the development of the site.

Article 8: Rural Development Districts The Rural Development Districts address areas of semi-rural development in the city where both residential uses and non-residential uses related to the natural resources of the area, like agriculture and fishing camps, are found. The character of these areas varies from large estate-type developments to mixed-use developments along the waterfront. Rural Development Districts maintain a relatively low density and are found in areas like lower coast Algiers and Lake Catherine

- **R-RE:** The purpose of the R-RE Rural Residential Estate District is to provide for large-lot, estate-type residential areas that create a low density environment that relates to the natural environment. Certain non-residential uses such as places of worship and recreational uses are also allowed, when compatible with rural residential surroundings.

Article 9 and **Article 10: The Historic Core Neighborhoods** are the neighborhoods that developed during the City's colonial period, including adjacent areas that continued those development patterns. Consisting of the Vieux Carré, Faubourg Marigny, Tremé, Bywater, and portions of surrounding

neighborhoods, the Historic Core Neighborhoods reflect a scale resulting from historically pedestrian movement. The regulations of the residential districts of the Historic Core Neighborhoods preserve and reflect the historic development pattern. Each of the residential districts within the Historic Core Neighborhoods contains a mix of dwelling types, creating a dense residential environment

- **M-MU:** The purpose of the M-MU Maritime Mixed-Use District is to address environmentally-compatible residential and non-residential development in areas adjacent to wetlands and waterbodies, generally located in areas of the city with higher elevation and near existing access roads. The M-MU District is mixed-use in nature, where residential uses are found close to water-related non-residential uses such as fishing camps, seafood processing facilities, and marinas.
- **HMR-1:** The HMR-1 Historic Marigny/Tremé/Bywater Residential District is intended to protect existing residential development and to maintain a desirable character of such development within the historic Marigny/Tremé/Bywater areas. Incompatible uses are excluded from this residential district. Rehabilitation, renovation, and adaptive reuse particularly of historically significant buildings are encouraged**.**
- **HMR-2**: The HMR-2 Historic Marigny/Tremé/Bywater Residential District is intended to protect existing residential development and to maintain a desirable character of such development within the historic Marigny/Tremé/Bywater areas. Incompatible uses are excluded from this residential district. Rehabilitation, renovation, and adaptive reuse particularly of historically significant buildings are encouraged. Smaller lot areas and higher floor-to-area ratios are permitted in the HMR-2 Historic Marigny/Tremé/Bywater Residential District than those allowed in the HMR-1 Historic Marigny/Tremé/Bywater Residential District.
- **HMR-3:** The HMR-3 Historic Marigny/Tremé/Bywater Residential District is intended to provide for single-family dwellings and two-family dwellings, accommodate small-scale multi-family dwellings of three to four units, protect the existing residential development and maintain the desirable character of such development within the historic Marigny/Tremé/Bywater areas. Incompatible uses are excluded from this residential district. Rehabilitation, renovation, and adaptive reuse particularly of historically significant buildings are encouraged. The purpose of this district is….
- **VCE:** The purpose of the VCE is to provide for entertainment places and restricted retail stores that attract and serve visitors and local residents.
- **VCE-1:** The purpose of this district is to provide for entertainment places and restricted retail stores along Decatur and N. Peters Streets that attract and serve visitors and local residents.
- **HMC-1:** The HMC-1 Historic Marigny/Tremé/Bywater Commercial District is intended to provide for restricted retail stores and service establishments that will attract tourists and local residents without adversely affecting either the character of the historic Marigny/Tremé/Bywater area or nearby residences. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.
- **HMC-2:** The HMC-2 Historic Marigny/Tremé/Bywater Commercial District is intended to permit more intensive commercial uses than the HMC-1 District, yet protect the historic character of the Marigny/Tremé/Bywater area. The district includes the peripheral properties

in Marigny/Tremé/Bywater that front on major traffic arteries and can provide access for more intense commercial uses. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.

- **HM-MU:** The HM-MU Historic Marigny/Tremé/Bywater Mixed-Use District is intended to provide a mixed-use environment of light industrial, commercial, and residential uses that would not adversely affect the historic character of the neighborhood. Compatibility of such uses and structures with one another and with the area is encouraged through the development review process. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.

Article 11: Historic Urban Neighborhoods Residential Districts The Historic Urban Neighborhoods are those areas of the city that were developed predominantly in the mid to late 19th century. The development pattern of Historic Urban Neighborhoods is characterized by a higher density and pedestrian scale environment with limited accommodation for the automobile. Within Historic Urban Neighborhoods, many of the residential neighborhoods contain traditional corner stores that serve the immediate residents and are in proximity to commercial clusters of local businesses.

The residential districts of the Historic Urban Neighborhoods contain regulations that create and maintain the established scale and character of these areas, with a higher residential density, acknowledges many of these areas were developed without accommodation for the auto, and respect the variety of setbacks seen in residential neighborhoods

- **HU-RS:** The HU-RS Single-Family Residential District is intended to provide for the traditional, pre-World War II single-family residential development. These areas are urban single-family neighborhoods of higher density and smaller setbacks than seen in the post-World War II areas of the City. Limited non-residential uses such as places of worship, historic neighborhood commercial establishments, and recreational facilities that are compatible with surrounding residential neighborhoods may be allowed.
- **HU-RD1:** The HU-RD1 Two-Family Residential District is intended to provide for the creation and maintenance of urban neighborhoods consisting of compact residential areas having a mix of housing types. The district accommodates two-family developments on smaller lots in older, more densely populated sections of the City. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing. Limited non-residential uses such as places of worship, historic neighborhood commercial establishments, and recreational facilities that are compatible with surrounding residential neighborhoods may be allowed.
- **HU-RD2:** The HU-RD2 Two-Family Residential District is intended to provide for two-family development on smaller lots in older, densely populated urban sections of the City mixed with detached single-family dwellings. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing. Limited non-residential uses such as places of worship, historic neighborhood commercial establishments, and recreational facilities that are compatible with surrounding residential neighborhoods may be allowed.
- **HU-RM1:** The HU-RM1 Multi-Family Residential District is intended to provide for low to medium residential densities appropriate for a variety of housing types such as single-family, two-family, townhouse and lower density multi-family dwellings. The district is intended to maintain a primarily residential environment with a variety of lower density dwelling types

therefore the building height is limited to three stories. Limited non-residential uses such as places of worship, historic neighborhood commercial establishments, and recreational facilities that are compatible with surrounding residential neighborhoods may be allowed.

- **HU-RM2:** The HU-RM2 Multi-Family Residential District is intended to provide for moderate density low-rise multi-family development of up to four stories as well as townhouse developments. This district may serve as a transition zone between single- and two-family neighborhoods and adjacent higher intensity land uses. Limited non-residential uses such as places of worship, historic neighborhood commercial establishments, and recreational facilities that are compatible with surrounding residential neighborhoods may be allowed.

Article 12: Historic Urban Neighborhoods Non-Residential Districts Historic Urban Neighborhoods are those areas of the city that were developed predominantly in the mid to late 19th century. The development pattern of Historic Urban Neighborhoods is characterized by a higher density and pedestrian scale environment with limited accommodation for the automobile. Within Historic Urban Neighborhoods, many of the residential neighborhoods contain traditional corner stores that serve the immediate residents and are in close proximity to commercial clusters of local businesses.

The non-residential districts of the Historic Urban Neighborhoods address the small-scale commercial areas have become integral parts of older neighborhoods. These range from pedestrian-oriented commercial clusters at the intersection of arterial streets, the traditional corner store, and mixed-use corridors. The regulations are intended to control the types of uses allowed and the scale of development to encourage their vitality while maintaining compatibility with nearby residential areas.

- **HU-B1A:** The HU-B1A Neighborhood Business District is intended to address an individual parcel or small cluster of parcels in non-residential use that exist within residential areas that have historically served the neighborhood and are located on a corner, including established corner stores. These historic neighborhood business uses are consistent with the character of the surrounding neighborhood and are intended to serve the immediate area with minimal impact on the surrounding residential uses. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.
- **HU-B1:** The HU-B1 Neighborhood Business District is intended for commercial areas that predominantly serve the needs of the nearby residential neighborhoods. The general character of this type of development should be sensitive to and compatible with its residential surroundings. In addition to commercial uses, this district provides for single-family dwellings, two-family dwellings and can accommodate small-scale multi-family dwellings. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.
- **HU-MU:** The HU-MU Neighborhood Mixed-Use District is intended for areas of mixed-use development that are close to residential neighborhoods. The district regulations are designed to encourage mixed-use areas that are compatible with adjacent or nearby land uses and pedestrian-oriented in character. In the HU-MU District, active retail and personal service uses along the ground floor with residential uses above are encouraged. A variety of residential dwellings are also allowed. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.

Article 13: Suburban Neighborhoods Residential Districts Suburban Neighborhoods developed primarily in the latter half of the 20th Century. These areas are characterized by lower density development, including neighborhoods of single-family development on lots of various sizes and more

spacious setbacks between homes than found in older areas of the City with a generally uniform front setback within each square. Commercial areas within the Suburban Neighborhoods tend to be physically separated from residential areas and have few, if any, ground floor residential uses. These areas are generally located along arterial streets and typically provide accommodation for the automobile, reflecting a more suburban style of development.

The residential districts of Suburban Neighborhoods contain regulations that create and maintain living environments that preserve and reflect a form of lower density development. Within Suburban Neighborhoods, the residential districts gradually increase in density, such that the general neighborhood character is a transition from single-family through multi-family that may abut or be in closer proximity to commercial districts.

- **S-RS:** The S-RS Single-Family Residential District is intended for single-family residential neighborhoods developed after World War II where a more uniform lotting pattern is evident with larger, generally uniform setbacks. Limited non-residential uses such as places of worship that are compatible with surrounding residential neighborhoods may be allowed.
- **S-RD:** The S-RD Two-Family Residential District is intended for use in newer areas of the City to facilitate the creation and maintenance of a more compact development type, where there may be a mix of housing types, including two-family and townhouse dwellings. This district also allows higher residential densities when a project is providing significant public benefits such a long-term affordable housing. Limited non-residential uses such as places of worship that are compatible with surrounding residential neighborhoods may be allowed.
- **S-RM1:** The S-RM1 Multi-Family Residential District is intended to maintain a residential environment that permits a variety of dwelling types. Population density is maintained in the medium range, and multi-family buildings up to four stories are permitted. Limited non-residential uses such as places of worship that are compatible with surrounding residential neighborhoods may be allowed.
- **S-RM2:** The S-RM2 Multi-Family Residential District is intended to maintain a residential environment that permits a variety of dwelling types. Population density is maintained in the medium range, and multi-family buildings up to four stories are permitted. The district is intended for suburban multi-family areas. Limited non-residential uses such as places of worship that are compatible with surrounding residential neighborhoods may be allowed.
- **S-LRS1:**The S-LRS1 Lakeview Single-Family Residential District is intended to provide for and encourage low density single-family residential development of a relatively spacious character, together with places of worship, recreational facilities, and accessory uses as may be necessary or typical for residential surroundings, in such a manner as to preserve the distinctive character of the Lakeview area. The district also is intended to provide for the maintenance of existing residential densities as well as opportunities for compatible residential growth.
- **S-LRD2:** The S-LRD2 Lakewood/Parkview Two-Family Residential District is intended to provide for two-family development on smaller lots of record in more densely populated sections of the Lake Area, together with places of worship, recreational facilities, and accessory uses as may be necessary or typical for residential surroundings. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.

- **S-LRM1:** The S-LRM1 Lake Area Low-Rise Multi-Family Residential District is intended to provide for low-rise, medium density multi-family residential development in the Lake Area in proximity to single-family and two-family residential development.
- **S-LRM2:** The S-LRM2 Lake Area High-Rise Multi-Family Residential District is intended to provide for medium to high-rise, high density multi-family residential development in proximity to single-family and two-family residential development, neighborhood business, general commercial, or marina areas.

Article 14: Suburban Neighborhoods Non-Residential Districts Suburban Neighborhoods developed primarily in the latter half of the 20th Century. These areas are characterized by lower density development, including neighborhoods of single-family development on lots of various sizes and more spacious setbacks between homes than found in older areas of the City with a generally uniform front setback within each square. Commercial areas within the Suburban Neighborhoods tend to be physically separated from residential areas and have few, if any, ground floor residential uses. These areas are generally located along arterial streets and typically provide accommodation for the automobile, reflecting a more suburban style of development.

The non-residential districts of Suburban Neighborhoods contain regulations that create and maintain environments that encourage lower intensity commercial development. Non-residential districts reflect a pattern of commercial development oriented toward a concentration of commercial uses in business district environments, rather than commercial uses interspersed throughout residential areas.

- **S-B1[5]:** The S-B1 Neighborhood Business District is intended to provide primarily for retail shopping and personal service uses that primarily serve nearby residential neighborhoods. The general character of this type of development should be sensitive to and compatible with more suburban residential surroundings.
- **S-B2[6]**: The S-B2 Pedestrian-Oriented Corridor Business District is intended for clusters of pedestrian-oriented business uses generally located along corridors. The district regulations are designed to encourage compatibility with adjacent or nearby suburban residential uses and maintain the pedestrian-oriented character of the area.
- **S-LB1[5&7]:** The S-LB1 Lake Area Neighborhood Business District is intended to provide for small offices, retail shopping and personal services uses, to be developed either as a unit or in individual parcels, to serve the needs of nearby low-density residential neighborhoods in a manner compatible with adjacent residential uses.
- **S-LB2[5&8]:** The S-LB2 Lake Area Neighborhood Business District is intended to provide for larger retail shopping venues and personal services uses, to be developed either as a unit or in individual parcels, to serve the needs of a relatively nearby small area of low to medium density residential neighborhoods.
- **S-LC[9]:** The S-LC Lake Area General Commercial District is intended to provide sufficient space in appropriate locations for a wide variety of commercial and miscellaneous service activities, generally serving a wide area and located particularly along certain existing major thoroughfares. The district is intended for application in intensely developed areas. Tall buildings are permitted, no front yards are required, and sign regulations are less restrictive than those in other business districts. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.

- **S-MU:** The S-MU Suburban Neighborhood Mixed-Use District is intended for areas of multi-family residential development to be developed as mixed-use areas, with ground floor neighbor-serving commercial uses and residential uses above. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing. Commercial uses that primarily serve nearby residential surroundings are encouraged.
- **S-LM:** The S-LM Lake Area Marina District is intended to accommodate the variety of commercial, open space, and water-related and outdoor recreational uses within the West End. This district also allows higher residential densities when a project is providing significant public benefits such as long-term affordable housing.

Article 15: Commercial Center & Institutional Campus Districts Commercial Center and Institutional Campus Districts represent the major destination areas within the city. They contain districts that address areas of commercial concentration and institutional campuses, and range from areas that are more pedestrian in orientation to those designed to accommodate significant parking demand. The types of commercial uses permitted within the Commercial Center and Institutional Campus Districts are based on a number of factors, including their proximity to residential areas, their location along major streets and the intensity of uses allowed within the districts. In addition to commercial districts that allow a variety of retail, personal service, office, and restaurant uses, specialized districts for large-scale users are also destination centers, such as hospital and university campuses. Finally, in certain districts a mixed-use environment is permitted where higher density residential uses and vertical mixed-use is encouraged.

Commercial Center and Institutional Campus Districts contain regulations that create and maintain intensive mixed employment, shopping, and entertainment destination environments. Controls within the districts address proper scales of development based on the desired intensity of the district, including regulations on parking, landscape, and screening

- **C-1:** The C-1 General Commercial District is intended to provide appropriate locations for a variety of commercial activities, generally serving a wide area and located particularly along commercial corridors with a mix of commercial, service, and residential activities. Areas of the C-1 District are oriented toward pedestrians but also accommodate larger commercial uses generally accessed by automobiles.
- **C2:** The C-2 Auto-Oriented Commercial District is intended for a wide variety of commercial activities, generally serving a wide area and located along major arterials. The C-2 District is intended for large-scale, auto-oriented commercial uses and strip commercial developments, which require significant parking. The C-2 District is also intended to accommodate marine-oriented commercial and recreational uses along major bodies of water.
- **C3:** The C-3 Heavy Commercial District is intended to provide for auto-oriented heavy commercial uses and large-scale shopping centers. Standards for the C-3 District are designed to maintain and enhance the appearance of these areas, and to provide adequate buffering between any residential and lower-intensity commercial properties adjacent to the district.
- **MU-1:** The MU-1 Medium Intensity Mixed-Use District is intended to encourage walkable neighborhood centers and corridors, with a mix of residential and commercial uses. Buildings may contain vertical mixed-use as well as single purpose uses designed to provide transitions to adjacent lower density residential areas.

- **MU**-2: The MU-2 High Intensity Mixed-Use District is intended encourage walkable neighborhood centers and corridors conducive to transit, with a mix of residential and supportive commercial and office uses. Buildings may contain vertical mixed-use as well as single purpose uses designed to be located both at neighborhood centers and along major arterial corridors.
- **EC**[3]: The EC Educational Campus District is intended for large university campus developments to facilitate an orderly and efficient regulation process for these types of uses. The district establishes a process that is flexible enough to accommodate evolving changes and expansions in campus plans, and creates the proper transitions between campus activities and adjacent neighborhoods. Within the district, development will proceed in accordance with an approved Institutional Master Plan that relates to the adjacent district, the surrounding neighborhoods, and needs of the universities.
- **MC**: The MC Medical Campus District is intended for medical campuses and the accompanying medical-related support services, including offices, research facilities and commercial uses, to facilitate an orderly and efficient regulation process for these types of uses. The district establishes a process that is flexible enough to accommodate evolving changes and expansion in medical campus plans, and creates the proper transitions between hospital activities and adjacent neighborhoods. Within the district, development will proceed in accordance with an approved Institutional Master Plan that relates to the adjacent district, the surrounding neighborhoods, and needs of the hospital.
- **MS**: The MS Medical Service District is intended for local hospitals and medical service facilities of lower intensity than large medical campuses. The MS District is intended for hospitals, and hospital-related and support services that are generally integrated within and connected to adjacent areas of commercial and residential development.
- **LS**: The LS Life Science Mixed-Use District is intended to provide a district that is focused on life sciences research, including research, development, medical and limited manufacturing activity. In addition to life science research and development uses, the area is also intended to be more mixed-use in nature, by also allowing higher density residential and supportive commercial uses to serve those that live and work within the district.

Article 16: Centers for Industry The Centers for Industry Districts contain an intensive mix of primarily non-residential uses. In most cases, the dominant character of these areas is that they are land extensive uses, such as office or industrial parks, industrial uses, and large research parks, both in campus developments and along designated corridors. Also, protection from encroachment of incompatible uses into the Centers for Industry Districts is key to preserve important city assets such as port-related uses and active industrial areas.

The Districts of the Centers for Industry contain regulations to create and maintain areas of major intensive employment and business operation destination environments. The Centers for Industry District can create significant impacts on surrounding uses, depending on the uses contained within, so proper site design, including auto storage and site circulation, landscape, and buffering, are key controls.

- **LI:** The LI Light Industrial District is intended to provide for a wide variety of light manufacturing, fabricating, processing, wholesale distributing and warehousing uses appropriately located near or adjacent to major thoroughfares or railroads for access.

Commercial uses and open storage of materials are permitted. Light industrial uses are typically low-intensity, non-nuisance light fabrication and assembly-type manufacturing, as well as office and research and development (R&D) facilities.

- **HI:** The HI Heavy Industrial District is intended to provide for industrial operations of all types with the appropriate design and development standards to assure protection of the public interest and surrounding property and persons. Heavy industrial uses are higher intensity manufacturing, warehouse, and storage uses. These manufacturing uses may produce moderate external effects such as smoke, noise, glare, or vibration.
- **MI[2]:** The MI Maritime Industrial District is intended to provide for water-related and maritime shipping-related industrial operations, in particular port operations. The MI District protects deepwater resources by limiting the types of industrial users allowed within the district. In addition, limited marine-oriented commercial and recreational uses are allowed within a sub-district of the MI District, subject to special design standards.
- **BIP:** The BIP Business-Industrial Park District is intended to provide appropriate locations for certain types of business and light industrial facilities in well-designed and landscaped campus environments, and provide employment opportunities near residential areas. Supporting commercial uses are permitted, primarily for service to employees in the district. Typical development in the district would be that which is commonly known as an office and industrial park.

Article 17: Central Business Districts New Orleans' Central Business Districts are characterized by a wide diversity of uses functioning within a single geography. These uses are mixed horizontally and vertically in a series of buildings, arranged along a continuous streetwall. The Central Business Districts are designed to serve a diversity of functions within this same compact geography, including the community's civic center, a regional employment center, an international visitor center, and centers of service and learning.

The zoning districts of the Central Business Districts contain regulations that create and maintain a focused destination that mixes employment, shopping, residential and entertainment activities in an intense, high density, primarily pedestrian environment.

- **CBD-1**: he CBD-1 Core Central Business District is intended for high-density, mixed-use development that accommodates a wide range of uses, including large office, financial, and commercial services uses that serve the local, regional, and national markets, as well as multi-family housing, retail, entertainment, hotel, government, and institutional uses.
- **CBD-2:** The CBD-2 Historic Commercial and Mixed-Use District is intended to provide for the reuse of existing structures in historic districts and along prominent mixed-use corridors that frame the Central Business District. Buildings in the CBD-2 District provide small floor plates for office, retail, institutional, and residential uses that support the vitality of the Central Business District as a destination for residents and visitors. The CBD-2 District addresses unique corridors and historic districts within the Central Business District, including Convention Center Boulevard, the Picayune Place Historic District, and the central portion of Canal Street.
- **CBD-3**: The CBD-3 Cultural Arts District is intended to create a cultural and entertainment destination through the clustering of museum, cultural, performing arts, and supporting visitor

services uses. The CBD-3 District is also intended to accommodate a mixture of residential, retail, and other commercial uses for residents and visitors. The CBD-3 District is specifically intended to address the music and theater corridor along and adjacent to the intersection of Basin, Rampart, and Canal Streets, and theaters and museum uses along Magazine Street and Howard Avenue.

- **CBD-4:** The CBD-4 Exposition District is intended for large destination uses and related services which generate high volumes of visitor traffic. The CBD-4 District addresses unique large-scale uses like the Superdome, Arena, and Convention Center.
- **CBD-5**: The CBD-5 Urban Core Neighborhood Lower Intensity Mixed-Use District is intended to provide for a downtown neighborhood environment through a mix of housing types and supporting residential services and commercial uses conveniently situated with respect to employment opportunities. The CBD-5 District is intended to accommodate a lower concentration of certain commercial uses than the CBD-6 District, and is particularly suited for the area around Lafayette Square and surrounding areas.
- **CBD-6:** The CBD-6 Urban Core Neighborhood Intensity Mixed-Use District is intended to provide for a downtown neighborhood environment with a mix of housing types, supporting residential services and commercial uses conveniently situated with respect to employment opportunities. The CBD-6 District is intended to accommodate a higher concentration of certain commercial uses than the CBD-5 District, and is particularly suited for the Warehouse District.
- **CBD-7:** The CBD-7 Bio-Science District is intended for large-scale bio-science campuses and supportive services. Standards for the CBD-7 District address the unique development of a large campus and its supportive services in order to create proper transitions from the campus to adjacent uses, as well as specific regulations for the core of the district.

6.2 Existing Definitions in the City's Comprehensive Zoning Ordinance and Code of Ordinances

Article 26 of the New Orleans Comprehensive Zoning Ordinance[72] identifies five different transient lodging types: Bed and Breakfast, Hotel/Motel, Hostel, Short Term Rental, and Timeshare. The definitions further divide Bed and Breakfasts into two types: Accessory and Principal, and divide Short Term Rentals into two types: Commercial and Non-commercial. The definitions used by the City for each use are detailed below. *For the purposes of this Study, the analysis of definitions that follows excludes Non-Commercial STRs.*

> **Bed and Breakfast.** A single-family dwelling, or other structure that has been legally converted to a single-family dwelling, that provides sleeping rooms for overnight paid occupancy. Bed and breakfast is further defined as follows:
>
> **A. Bed and Breakfast, Accessory.** An operator-occupied single-family dwelling, which provides no more than five (5) guest bedrooms for overnight paid occupancy of up to thirty (30) nights. Common bathroom facilities may be provided rather than private baths for each guest bedroom.
>
> **B. Bed and Breakfast, Principal.** An operator-occupied single-family dwelling that provides no more than nine (9) guest bedrooms for overnight paid occupancy of up to thirty (30)

[72] Article 26 definitions. (2024). Retrieved from https://czo.nola.gov/article-26/.

nights. Common bathroom facilities may be provided rather than private baths for each guest bedroom.

Hostel. An establishment providing sleeping accommodations for a fee in a sociable accommodation where guests can rent a bed in a dormitory and share bathroom, lounge, and kitchen facilities.

Hotel/Motel. An establishment providing a private room for sleeping accommodations for a fee with private bathroom facilities and customary lodging services. Related ancillary uses may include, but are not limited to conference and meeting rooms, restaurants, sale of convenience items, bars, and recreational facilities. Hotels shall be permitted to include units for sale designed or used exclusively for permanent residential use in all districts except in Light Industrial (LI), Heavy Industrial (HI), and Business Industrial Park (BIP) districts.

Rental. The use and enjoyment by guests of a Dwelling Unit, or any portion thereof, for a period of less than thirty (30) consecutive days, in exchange for money, commodities, fruits, services, or other performances. Hotels, motels, Bed and Breakfasts, and other land uses explicitly defined and regulated in the CZO separately from Rentals are not considered to be Rentals. A rental is further defined as follows:

A. **Rental, Non-Commercial.** A Rental where the operator, who may not be a guest, physically resides in a bedroom on the lot of record containing the Rental during any guest stays and, if required by the City Code, maintains a primary residence on the lot of record. In some cases, the operator-occupant may be the property owner. The operator and all owners of the property must be natural persons aged 18 years or over. Non-Commercial Rental is a temporary use as described in Article 21. Only one (1) Non-Commercial rental license is allowed per lot, and each permit shall provide no more than three (3) guest bedrooms and six (6) total guests for overnight paid occupancy as a temporary use. Only one lot within each City block, inclusive of all lots fronting any exterior boundary of said block and all interior lots not fronting the public right of way, may be permitted for use as a non-commercial rental.

B. **Rental, Commercial.** An establishment providing rental of one (1) or more dwelling units for overnight paid occupancy. Each dwelling unit is limited to five (5) guest bedrooms and no more than ten (10) occupants.

Timeshare building. A building containing condominium units, rooms or suites of rooms, with or without culinary facilities and subject to a timeshare plan. The construction of or conversion to timeshare buildings must be registered with the Department of Safety and Permits by applying for a Certificate of Use and Occupancy.

Timeshare Plan. Any plan or program in which the use, occupancy, or possession of one (1) or more condominium units, rooms, or suites of rooms in a timeshare building circulates among various unrelated persons for a specific or discernible period by temporal division of less than a sixty (60) day period in any year for any occupant. Timeshare plans include timeshare ownership plans and timeshare use plans, as follows:

A. Timeshare ownership plan is any arrangement, whether through common ownership, sale or by other means, whereby a person receives an ownership interest in a condominium unit, room, or suite of rooms in a timeshare building.

B. Timeshare use plan is any arrangement, excluding normal hotel operations, whether by membership agreement, lease, rental agreement, license, use agreement, security, or other means, whereby a person receives the right to use but not an ownership interest in a condominium unit, room, or suite of rooms in a timeshare building.

City definitions are drafted to not only define, but also regulate, transient lodging uses. CSTRs were originally permitted similar to NSTRs but were then moved into the commercial use category in the Comprehensive Zoning Ordinance and now undergo requirements similar to commercial uses. CSTRs are defined and regulated more consistently with Hotels and Motel land uses than Bed and Breakfasts. CSTRs and Bed and Breakfasts (both accessory and principal) have duration limitations for guest stays (no more than 30 days); may offer common bathroom facilities; and may occur within a single-family dwelling provided services are limited to a specific number of rooms. CSTRs have more restrictions than Bed and Breakfasts in that each is also limited in the total number of guests for overnight occupancy. However, Bed and Breakfasts must meet building code regulations, while CSTRs do not. In contrast, Hotels and Motels are not limited in the duration of stay or number of visitors, and must provide private rooms and bathroom facilities. However, use standards for hotels do not currently exist in the zoning regulations.

The standards for Hotels and Motels are largely included in the Code of Ordinances. These standards generally address obtaining alcoholic beverage licenses (Chapter 10), permitting amusement and entertainment (Chapter 14), meeting the building code (Chapter 26), ensuring fair business practices in support of the city's tourism industry, including having dedicated staff on site at all times (Chapter 30), and collecting taxes (Chapters 70 and 150).

Chapter 10, Alcoholic Beverages, details the permitting process for selling alcoholic beverages in Hotels, which allows hotels – as defined in the Comprehensive Zoning Ordinance and licensed by the Department of Safety and Permits – to obtain alcoholic beverage permits to serve guests as well as the public. The chapter further explains the restrictions to serving alcohol within 300 feet of a playground, place of worship, public library, or school if licensed after May 1, 1953. Chapter 14, Amusements and Entertainments, exempts Hotels and Motels from obtaining dance hall permits when not charging admission.

Chapter 26, Buildings, Building Regulations and Housing Standards, lists the building code requirements for all buildings in the City. The chapter adopts the International Building Code, International Mechanical Code, International Fire Code, and International Energy Conservation Code for all new buildings in the City. The chapter also requires all residential and nonresidential buildings to follow the minimum Property Maintenance Code. The chapter further provides for requirements based on the plumbing code, including inspections, maintenance, and repairs. Hotels and Motels must meet all of these requirements to operate.

Chapter 26, Article IX includes standards for Hotels and Motels, including prohibiting condominium associations from hotel / motel occupational licenses, and includes a section specific to the Downtown Development District. This section refers to the Comprehensive Zoning Ordinance for definitions of Hotels and Motels. It also provides limits on the total number of new Hotel or Motel rooms allowed in the district in a certain time period, which become null and void if the occupancy rate is greater than 67.5% each month for four consecutive months. These limitations were active in the late 80s and early 90s but do not appear to be currently active or utilized.

Chapter 26, Article XI, Standards for Short Term Rentals, states that Hotels, Motels, Bed and Breakfasts, and other land uses explicitly defined and regulated in the CZO as being different from Short Term Rentals are not considered Short Term Rentals and are exempt from having to obtain Short Term

Rental permits. The section also defines Rental using the same definition as the CZO. Finally, Article XIII, Healthy Homes Program, defines rental housing unit as being occupied by a lessee for residential purposes, but exempts dwelling units in Hotels, Motels, Bed and Breakfasts, and Hostels from this definition.

Chapter 30, Businesses, ensures fair business practices in support of the city's tourism industry. It allows for punishment for refusing to pay for food or beverages in hotels, inns, boardinghouses, restaurants, etc. Article IX, Hotels and Motels, defines Hotel or Motel using the same definition as the CZO, but adds "motor courts, tourist courts, motor lodges, and time-share units shall all be considered *hotels* or *motels*, as defined herein, if a charge or maintenance fee is assessed for the use of a room or suite. However, this definition shall not include rooming houses, if the minimum length of stay in the rooming house is 30 days or more, and shall not include transient lodging services licensed as short-term rentals." The chapter requires Hotels and Motels to share rate and charge information with the Department of Finance, keep a record of those charges at the registration desk, and not charge rates higher than the published rate schedule. It prohibits Hotels or Motels in residential or neighborhood business districts from charging for rooms on less than a daily or overnight basis. It also requires on-site staff for Hotels and Motels at all times.

Chapter 70, Finance, allocates funds for infrastructure maintenance, including the "lost penny" sales tax from Hotels from the Fair Share Agreement, and the amount of Hotel Occupancy Tax detailed in Chapter 150. Chapter 150, Taxation, defines hotel as "any establishment or person engaged in the business of furnishing sleeping rooms, cottages, or cabins to transient guests, where such establishment consists of sleeping rooms, cottages, or cabins at any of the following: (1) a single business location; (2) a residential location, including but not limited to a house, apartment, condominium, camp, cabin, or other building structure used as a residence. For purposes of this article, hotel shall not mean or include any establishment or person leasing apartments or single-family dwellings on a month-to-month basis." Of note, this definition is different from Chapter 26 and 30, and thus different from the CZO definition. This chapter exempts Hotel rooms from the additional one-half of one percent sales and use tax. It establishes a Hotel Occupancy Tax, as well as a sales tax on meals served in Hotels and parking services. It further requires Hotel operators to provide monthly or quarterly reports on the hotel occupancy tax. It also requires each Hotel and Motel to obtain an occupational license, but that occupational license can cover ancillary uses. The occupational license tax is established as $2.00 for each sleeping room.

Additionally, there are standards for Short Term Rentals in the Code of Ordinances, related to adjudication procedures (Chapter 6), building regulations (Chapter 26), and funds and taxes (Chapters 70 and 150).

Chapter 6, Administrative Procedures, establishes administrative adjudication procedures for Short Term Rentals, including notices of violation, administrative hearings, judgments, and penalties, including liens.

Chapter 26, Buildings, Building Regulations, and Housing Standards, includes Article XI, Standards for Short Term Rentals. It uses the same definition for Short Term Rentals as the Comprehensive Zoning Ordinance. It sets permit requirements for Short Term Rentals for owners and operators, including platform requirements, fees, documentation, and legal duties of owner/operators. It establishes powers

for the Department of Safety and Permits to conduct inspections and rescind and suspend permits. It also allows for enforcement procedures for violations, to include penalties, suspension, and revocation.

Chapter 70, Finance, establishes the Short Term Rental Fund, allowing permit fees and fines to fund the enforcement of Short Term Rental laws. It requires the Director of Finance to keep records of this fund and make annual reports to the City Council. It also allocates funds for infrastructure maintenance, to include 75% of the 6.75% tax on Short Term Rentals.

Chapter 150, Taxation, defines Short Term Rental similarly to the CZO, and requires owner/operators to pay an occupancy tax to the Department of Finance. It also requires hosting platforms to submit all taxes and fees to the Department of Finance and provide a monthly report detailing these fees. It allocates the taxes to be allocated to the infrastructure fund (75%) and New Orleans and Company (25%). It allows the Department of Finance to inspect the reports for a four-year period and provides civil and criminal penalties for failing to collect and report fees.

There are no specific standards or regulations for Bed and Breakfasts, Hostels, or Timeshares, beyond the brief mention of these uses within the Hotel standards. While changes to the Code of Ordinances are outside the scope of this Study, it is important to note them as potential changes to the Comprehensive Zoning Ordinances are made for consistency of regulatory regimes.

Other relevant transient lodging definitions. Other relevant transient lodging definitions currently in use include:

Customary Lodging Services. Guest services provided by lodging facilities including hotels/motels. Customary services include at a minimum 1) dedicated lobby space to adequately enable check-in/check-out procedures, and 2) personnel/staffing to assist guests at check-in/check-out.

Dormitory. A structure used for living and sleeping accommodations related to an educational facility, hospital, institutional use, or a hostel.

Dwelling. A structure, or portion of a structure, designed or used exclusively for permanent residential purposes, including single-family, two-family, townhouse, and multi-family dwellings, but not including trailers, hotels/motels, rooming houses, or automobiles.

Dwelling, Above the Ground Floor. Dwelling units that are within multi-story buildings located above non-residential uses on the ground floor or located behind non-residential uses on the ground floor. In the case of dwelling units located behind non-residential uses on the ground floor, non-residential uses shall be located along the primary street frontage.

Dwelling, Attached. A dwelling designed as a single structure, but containing more than one (1) dwelling unit, each of which is designed to be occupied as a separate permanent residence for one (1) household or family.

Dwelling, Caretaker. A permanent residence for the owner or persons employed on a site for purposes of care and protection of persons, property, plants, animals, equipment or other circumstances on site or on contiguous lots under the same ownership.

Dwelling, Detached. A structure containing one (1) dwelling unit.

Dwelling, Established Multi-Family. A residence with a history of multi-family use which is authorized to operate as a multi-family residence in accordance with Section 20.3.W.

Dwelling, Established Townhouse. A residence with a history of townhouse use which is authorized to operate as a townhouse residence in accordance with Section 20.3.W.

Dwelling, Established Two-Family. A residence with a history of two-family use which is authorized to operate as a two-family residence in accordance with Section 20.3.W.

Dwelling, Existing Single-Family. A dwelling with a history as a single-family residence that currently exists.

Dwelling, Multi-Family. A dwelling designed for occupancy by three (3) or more families. A multi-family dwelling does not include a townhouse dwelling.

Dwelling, Single-Family. A dwelling designed for occupancy by no more than one (1) family.

Dwelling, Small Multi-Family Affordable. An Affordable Housing Development comprised of one or more structures designed for occupancy of no more than four (4) dwelling units in accordance with Section 20.3.SSS and where one affordable housing unit is included. For those small multi-family affordable developments that are 1) located in the HU-RD1, HU-RD2, S-RD, S-LRD1, and S-LRD2 Two-Family Residential Districts, and 2) comprised of more than one principal structure, each additional dwelling unit exceeding the two-family dwellings currently allowed in each district and developed in an additional principal structure shall be limited to a maximum of two bedrooms. This two bedroom limitation shall not apply to the affordable rental uni**t.**

Dwelling, Townhouse. A structure consisting of no less than three (3) dwelling units, with no other dwelling or portion of other dwelling located directly above or below, where each unit has a separate entrance and direct ground level access to the outdoors. These units are connected to other dwelling units by a single party wall with no opening. The primary facade and primary dwelling entrances face a public or private street. A townhouse dwelling does not include a multi-family dwelling. A townhouse dwelling refers to the design of a structure and does not reflect the type of ownership of the individual units.

Dwelling, Two-Family. A dwelling designed for occupancy by two (2) families.

Dwelling Unit. A room, or group of rooms, providing complete, independent living facilities, including permanent provisions for living, sleeping, eating, cooking and sanitation for one or more persons.

Guest Bedroom. An enclosed room designed for and outfitted to be used for sleeping and/or lodging of guests. A guest bedroom shall not be a shared space or a space designed for or outfitted to be used for any purpose other than sleeping or lodging of guests (e.g. kitchens, dining rooms, living rooms, parlors, attics, offices, game rooms, or utility rooms). Only legally permitted guest bedrooms shall be used for the purposes of calculating the maximum number of guests a Short Term Rental is permitted.

Habitable Space. A space in a building for living, sleeping, eating, or cooking. Bathrooms, toilet rooms, closets, halls, storage or utility spaces and similar areas are not considered habitable spaces.

Party of Guests. An individual or group renting or seeking to rent a Short Term Rental in its entirety. When occupied by a party of guests, the Short Term Rental shall not be separately rented to any other individual or party of guests.

*Other land uses that reference transient stays generally.**

**Note: underlined words added to draw attention to transient terms in use.*

Fishing Camp. Areas reserved for public or private fishing, and structures in support of those activities, excluding transient rentals.

Recreational Vehicle (RV) Park. Any lot or parcel of land used or intended to be used for the accommodation of two (2) or more recreational vehicles for transient dwelling purposes for a maximum of fifteen (15) days.

Campground. An area to be used for transient occupancy by camping in tents, camp trailers, recreational vehicles, travel trailers, motor homes, or similar movable or temporary sleeping quarters of any kind for a maximum of fifteen (15) days.

Truck Stop. A structure or land used or intended to be used primarily for the retail sale of fuel for trucks and, usually, incidental service or repair of trucks. The site may also include attendant eating, sleeping, or truck parking facilities. As used in this definition, the term trucks does not include any vehicle whose maximum gross weight is ten thousand (10,000) pounds or less as rated by the Louisiana Office of Motor Vehicles.

Truck Terminal.

A. A structure or land used or intended to be used primarily:
   1. To accommodate the transfer of goods or chattel to other trucks or truck trailers or to vehicles of other types, in order to facilitate the transportation of such goods or chattel.
   2. To accommodate parking or storage of trucks or truck trailers.

B. A truck terminal may include, as incidental uses only, sleeping quarters and other facilities for trucking personnel, facilities for the repair or service of vehicles, or necessary truck storage space involved in the transit of goods or chattel. Truck terminals include facilities for the storage of freight shipping containers designed to be mounted on chassis for part or all of their transport, but does not include a warehouse, moving and storage establishment, or truck stop. Land used as an accessory to a lawful business or industrial use other than a truck terminal for the parking, storage, or repair of trucks is not a truck terminal within the meaning of this definition. As used in this definition, the terms trucks, truck trailers, and truck tractors do not include any vehicle whose maximum gross weight is ten thousand (10,000) pounds or less as rated by the Louisiana Department of Motor Vehicles. A truck terminal may have provisions to allow for the transfer of goods to water, air, rail or another truck. Truck terminals are further divided into the following classes:
   1. **Trucking Terminal, Class I (Freight Transfer Terminal)**. A trucking facility whose primary purpose is to accommodate the transfer of goods or chattel from trucks or truck trailers or to vehicles of other types in order to facilitate the transportation of such goods or chattels. Such a facility does not include video poker gaming/gambling.
   2. **Trucking Terminal, Class II (Truck Storage Lot**). A trucking facility which includes a truck yard and the primary purpose of which is to accommodate the parking or storage of trucks, truck trailers or truck tractors. Such a facility does not include video poker gaming/gambling.

Terms related to long-term and affordable housing relevant to this Study.

Affordable Housing. Housing for which the occupant(s) is/are generally paying no more than 30 percent of household income for gross housing costs, including utilities.

Affordable Housing Development. Any development which includes residential use that creates a specified percentage of affordable housing units whether on one lot or on adjoining lots in common ownership or common control and is located within, a designated Mandatory Inclusionary Zoning

Sub-District (MIZ), or an Affordable Housing Planned Development (AHPD) or is participating in Voluntary Inclusionary Zoning.

Affordable Housing Set-Aside. A recorded restriction that requires a certain percentage of dwellings within a development to be rented or owned by families and individuals whose income at initial occupancy is no more than the household income threshold requirement (a percent of the area median income (AMI)) as determined by the Federal Department of Housing and Urban Development income limits and adjusted for family size. Incomes levels are defined as follows:

A. *Low Income.* No more than eighty percent (80%) of area median income.

B. *Very Low Income.* No more than fifty percent (50%) of area median income.

C. *Extremely Low Income.* No more than thirty (30%) of area median income.

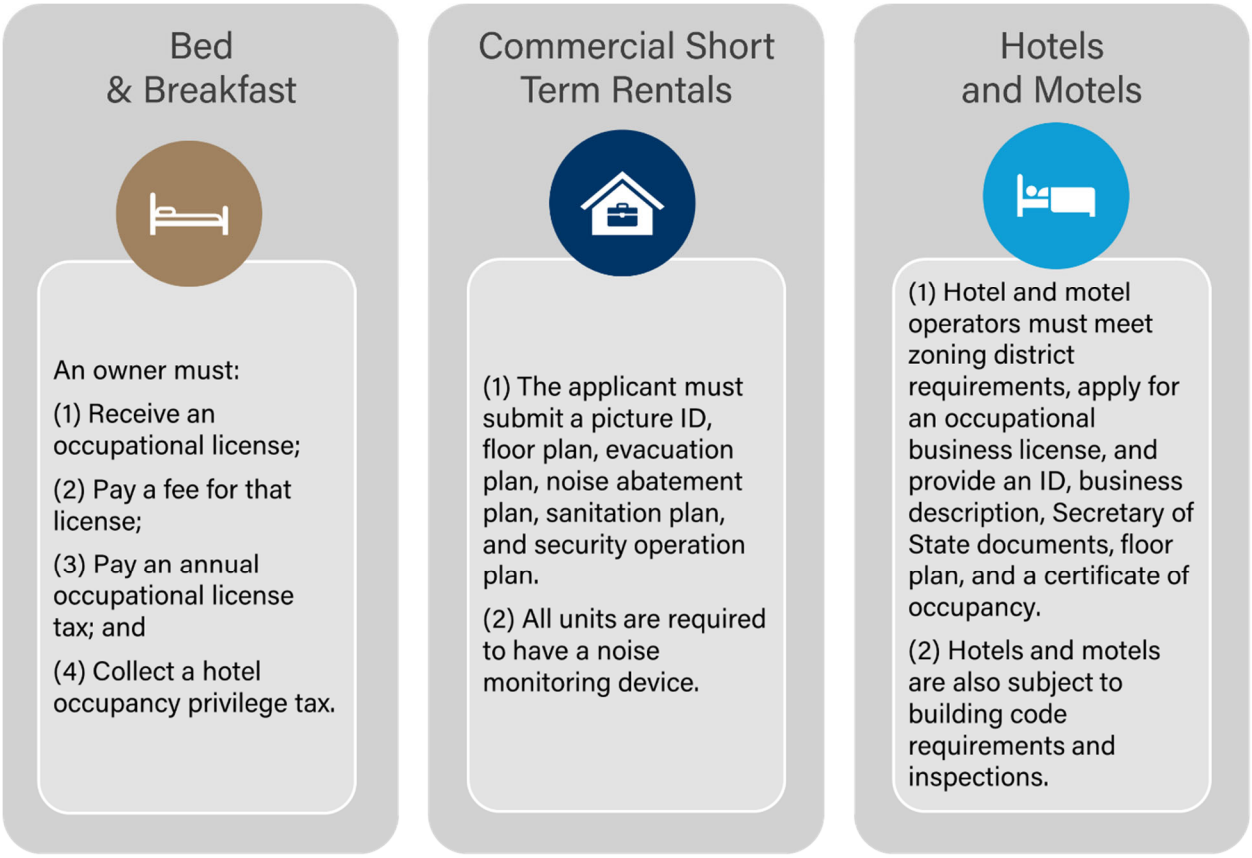
Affordable Housing Unit. Any housing unit with Affordable Rent required as part of a residential development subject to the inclusionary zoning regulations outlined in this ordinance located within, a designated Mandatory Inclusionary Zoning Sub-District (MIZ), or an Affordable Housing Planned Development (AHPD) or within the Municipal Code of New Orleans.

Affordable Rent. The rent paid for a dwelling unit that is defined herein as Affordable Housing.

6.3 Existing Permit and Licensing Requirements

While there are some similarities across the definitions of transient lodging uses in the City, permit and license requirements are different for each land use (**Figure 22**).

FIGURE 22: SUMMARY OF TRANSIENT LODGING USE PERMITTING AND LICENSING REQUIREMENTS



It is important to note that in February 2025, the City Council directed the City Planning Commission to consider an amendment to the Comprehensive Zoning Ordinance requiring Hotels or Motels to provide 24 hour staffing by amending the definition of customary lodging services.[73] This text amendment aligns the CZO with a recent Zoning Interpretation Memorandum stating that the current wording in the CZO requires 24 hour staffing for Hotels and Motels.[74]

6.4 Existing Zoning Districts that Permit Transient Lodging Uses By Right or Conditionally.

Table 26 lists the City zoning districts that permit either Bed and Breakfasts, Hostels, Hotel /Motels, CSTRs, or Timeshares by right (indicated by a letter "P") or conditionally via a Conditional Use Permit (indicated by a letter "C"). The Conditional Use Permit process for these uses generally aims to protect historic neighborhoods and districts that abut or include residential uses. It is important to note that

[73] Morrell, J.P. and Harris, L. (2025, February 2). *Motion No. M-25-135*. New Orleans City Council. https://cityofno.granicus.com/MetaViewer.php?view_id=&event_id=24197&meta_id=729588
[74] Jackson, T. (2025, February 21). *Zoning Interpretation Memorandum: Memorandum Z-25-01.* City of New Orleans Office of Business and External Services Department of Safety and Permits. https://nola.gov/getattachment/NEXT/Safety-and-Permits/Topics/Zoning-Administration/Zoning-Interpretations-(1)/Z-25-01-The-Board-of-Zoning-Adjustments-decision-in-BZA014-25-and-Customary-Lodging-Services-as-defined-in-the-CZO.pdf/?lang=en-US

the Commercial Short Term Rental Interim Zoning District currently in place prohibits the development of new CSTRs and Hostels and limits the development of Timeshares at this time.

TABLE 26: CURRENT ZONING DISTRICT REGULATIONS FOR BED AND BREAKFASTS, HOTELS, AND COMMERCIAL SHORT TERM RENTALS[75]

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE	SUB-DISTRICT	LAND USES					
		BED AND BREAKFAST – ACCESSORY	BED AND BREAKFAST – PRINCIPAL	HOSTEL	HOTEL/MOTEL	RENTAL, COMMERCIAL	TIMESHARE
Article 7: Open Space Districts	OS-N						
	OS-G						
	OS-R						
	NA						
	GPD				C	C	
	OS-CBD						
	OS-AR						
Article 8: Rural Development Districts	R-RE	C					
	M-MU	C	C			P	
Article 9: Historic Core Neighborhoods Residential Districts	VCR-1						
	VCR-2						
	HMR-1	C	C				
	HMR-2	C	C				
	HMR-3	C	C				
Article 10: Historic Core Neighborhoods Non-Residential Districts	VCC-1						
	VCC-2						

[75] City Planning Commission. (2025). *New Orleans Comprehensive Zoning Ordinance.* Retrieved from https://czo.nola.gov/home.

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE	SUB-DISTRICT	LAND USES					
		BED AND BREAKFAST – ACCESSORY	BED AND BREAKFAST – PRINCIPAL	HOSTEL	HOTEL/MOTEL	RENTAL, COMMERCIAL	TIMESHARE
	VCE	C	C			P	
	VCE-1						
	VCS						
	VCS-1						
	VCP						
	HMC-1	C	C			C	
	HMC-2	C	C	P	P	P	
	HM-MU	C	C		C	P	
Article 11: Urban Neighborhoods Residential Districts	HU-RS	C					
	HU-RD1	C					
	HU-RD2	C					
	HU-RM1	C	C				
	HU-RM2	C	C				
Article 12: Historic Urban Neighborhoods Non-Residential Districts	HU-B1A	C	C				
	HU-B1	C	C				
	HU-MU	C	C	C	C	P	
Article 13: Suburban Neighborhoods Residential Districts	S-RS	C					
	S-RD	C					
	S-RM1	C					
	S-RM2	C					
	S-LRS1	C					
	S-LRS2						

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE	SUB-DISTRICT	LAND USES					
		BED AND BREAKFAST – ACCESSORY	BED AND BREAKFAST – PRINCIPAL	HOSTEL	HOTEL/MOTEL	RENTAL, COMMERCIAL	TIMESHARE
	S-LRS3						
	S-LRD1						
	S-LRD2	C					
	S-LRM1	C					
	S-LRM2	C					
Article 14: Suburban Neighborhoods Non-Residential Districts	S-B1[5]						
	S-B2[6]					P	
	S-LB1[5&7]	C	C				
	S-LB2[5&8]	C	C			P	
	S-LC[9]	C	C	C	C	P	P
	S-MU	C					
	S-LP						
	S-LM				C	P	
Article 15: Commercial Center & Institutional Campus Districts	C-1			P	P	P	
	C-2			P	P	P	C
	C-3			P	P	P	
	MU-1	C	C	P	P	P	C
	MU-2	C	C	P	P	P	
	EC[3]	C		P	P	P	
	MC			P	P	P	C
	MS				P	P	C
	LS			P	P	P	C

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE	SUB-DISTRICT	LAND USES					
		BED AND BREAKFAST – ACCESSORY	BED AND BREAKFAST – PRINCIPAL	HOSTEL	HOTEL/MOTEL	RENTAL, COMMERCIAL	TIMESHARE
Article 16: Centers for Industry	LI				P	P	
	HI				C	C	
	MI[2]				P	C[6]	
	BIP			P	P	P	P
Article 17: Central Business Districts	CBD-1	C	C	P	P	P	P
	CBD-2	C	C	P	P	P	P
	CBD-3	C	C	P	P	P	P
	CBD-4			P	P	P	P
	CBD-5	C	C		C	P	
	CBD-6	C	C		P	P	
	CBD-7			P	P	P	P

Table 26 demonstrates there is no clear regulatory policy in place that establishes a hierarchy of land use impacts associated with transient lodging uses, which would include a clear methodology for when, where, and why these land uses are permitted (and with what standards) or prohibited. Patterns and conditions are examined below for *each use*, then compared to each other to assess areas where regulatory frameworks may align or conflict.

Current regulatory approach for each use

- **Bed and Breakfast:** Bed and Breakfasts, both accessory and principal, are only permitted through Conditional Use approval in residential, non-residential, and other applicable districts. This is a result of Ordinance No. 29382, passed in 2023, which uniformly changed Bed and Breakfast regulations to require Conditional Use approval, regardless of the zoning district. This restriction was a result of ongoing changes to STR regulations where Bed and Breakfasts were utilized as a loophole to create STRs.

- **Hostels** must obtain Conditional Use Permits for HU-MU Neighborhood Mixed Use and S-LC Lake Area General Commercial Districts. Hostels are permitted by right in BIP Business-Industrial Park District, CBD 1-4 and 7 Central Business Districts, C-1 General Commercial District, C-2 Auto-Oriented Commercial District, C-3 Heavy Commercial District, MU-1 Medium Intensity Mixed use District, MU-2 High Intensity Mixed use District, EC Educational Campus District, MC Medical Campus District, LS Life Science Mixed use District, and HMC-2 Historic Marigny/Tremé/Bywater Commercial District, which are districts predominately characterized by commercial and tourism uses.
- **Hotels and Motels** are permitted upon Conditional Use approval in GPD General Planned Development Districts, HM-MU Historic Core Neighborhoods Non-Residential Districts, HU-MU Historic Urban Neighborhoods Non-Residential Districts, S-LC Lake Area General Commercial District, S-LM Lake Area Marina Districts, HI Heavy Industrial Districts, and CBD-5 Urban Core Neighborhood Lower Intensity Mixed use Districts. Hotels and Motels are allowed by right in the HMC-2 Historic Marigny/Tremé/Bywater Commercial District, C-1 General Commercial District, C-2 Auto-Oriented Commercial District, C-3 Heavy Commercial District, MU-1 Medium Intensity Mixed use District, MU-2 High Intensity Mixed use District, EC Educational Campus District, MC Medical Campus District, MS Medical Services District, LS Life Science Mixed use District, LI Light Industrial District, MI Maritime Industrial District, BIP Business-Industrial Park District, and CBD 1-4, 6 and 7 Central Business Districts, which are districts predominately characterized by commercial and tourism uses.
- **CSTRs** must obtain Conditional Use approval for the GPD General Planned Development District, the HMC-1 Historic Marigny/Tremé/Bywater Commercial District, the HI Heavy Industrial District, and the MI Maritime Industrial District. CSTRs are permitted by right in the M-MU Maritime Mixed use District, the VCE Vieux Carre Commercial District, the HMC-2 Historic Marigny/Tremé/Bywater Commercial District, the HM-MU Historic Marigny/Tremé/Bywater Mixed use District, the HU-MU Neighborhood Mixed use District, the S-B2 Pedestrian Oriented Corridor Business District, the S-LB2 Suburban Lake Area Neighborhood Business District, the S-LC Lake Area General Commercial District, the S-LM Lake Area Marina District, C-1 General Commercial District, C-2 Auto-Oriented Commercial District, C-3 Heavy Commercial District, MU-1 Medium Intensity Mixed use District, MU-2 High Intensity Mixed-use District, EC Educational Campus District, MC Medical Campus District, MS Medical Services District, LS Life Science Mixed-use District, LI Light Industrial District, BIP Business-Industrial Park District, and CBD 1-7 Central Business Districts. However, due to the recently enacted Preserving Residential Character Interim Zoning District and Commercial Rental Interim Zoning District regulations, there is currently a moratorium on all new CSTR permits.
- **Timeshares** must obtain Conditional Use approval to locate in the C-2 Auto-Oriented Commercial District, MU-1 Medium Intensity Mixed-Use District, MC Medical Campus District, MS Medical Services District, and the LS Life Science Mixed-Use District. Timeshares are permitted by right in the S-LC Lake Area General Commercial District, and the CBD 1-4 and 7 Central Business Districts.

High-level conflicts and alignment in regulatory frameworks

- Per the current code, CSTRs are permitted by right in 8 districts that Hostels, Hotels and Motels, and Timeshares are not: the M-MU Maritime Mixed Use District, the VCE Vieux Carre Commercial District, the HM-MU Historic Marigny/Tremé/Bywater Mixed use District, the HU-MU Neighborhood Mixed Use District, the S-LB2 Pedestrian Oriented Corridor Business District, the

S-LM Lake Area Marina District, and the CBD-5 Urban Core Neighborhood Lower Intensity Mixed use District.
    - Bed and Breakfasts are permitted (through a Conditional Use approval) in all of these districts, except for the S-LB2 Pedestrian Oriented Corridor Business District and the S-LM Lake Area Marina District. This difference is likely due to the smaller nature of the districts, where a CSTR would fit into the landscape more easily than a Hotel or Motel, but it is something to examine for future impacts.
    - CSTRs are permitted in the S-LC Lake Area General Commercial District along with Timeshares, but Hotels, Motels, and Hostels are not.
- Conversely, Hotels and Motels are permitted by right in MI Maritime Industrial Districts, while Bed and Breakfasts, CSTRs, Hostels, and Timeshares are not. There are 11 districts that allow CSTRs that do not permit Bed and Breakfasts: the S-B2 Pedestrian Oriented Corridor Business District, the C-1 General, C-2 Auto-Oriented, and C-3 Heavy Commercial District, the MC Medical Campus District, the MS Medical Services District, the LS Life Science District, the LI Light Industrial District, the BIP Business-Industrial Park District, the CBD-4 Exposition District, and the CBD-7 Bio-Science District. This may be due to the prevalence of apartment style accommodations in those districts, but again, it is something to examine for future impacts.

6.5 Current Occupational Licenses and Permits for Transient Lodging Uses

As of February 2025, there were a total of 2,944 active occupational licenses and permits for transient lodging uses in the City. Of this total, Bed and Breakfasts account for 3.7% (or 109) of the licenses; Hotels and Motels account for 7.4% (or 220), NSTRs account for 46.1% (or 1,358); and CSTRs account for 38.5% (or 1,134). Of importance, while Hotels and Motels are a smaller share, they are not limited on the number of rooms provided by each license, so the smaller share represented by occupational licenses does not indicate that there are more or less Hotel / Motel units than CSTRs. It does, however, indicate that there are more *individual NSTR and CSTR license-holding operators* than any other transient lodging use, at 88.2%.

TABLE 27: CURRENT OCCUPATIONAL LICENSES FOR TRANSIENT LODGING USES

TRANSIENT LODGING USE TYPE	TOTAL LICENSES	%
Bed & Breakfast – 1-2 Rooms	11	0.4%
Bed & Breakfast – 3-5 Rooms	5	0.2%
Bed & Breakfast Inns	93	3.3%
Total Bed & Breakfasts	**109**	**3.9%**
Hotels & Motels	220	7.8%
Traveler Accommodation	3	0.1%
Total Hotels and Traveler Accommodation	**223**	**7.9%**
Total NSTRS	**1,358**	**48.1%**
Total CSTRs	**1,134**	**40.2%**
Total STRs	**2,492**	**88.2%**
Total All Transient Lodging Uses	**2,824**	

6.7 Transient Lodging Use Listing and Location Trends

Transient lodging uses are located throughout the City. These uses include Bed and Breakfasts, Hostels, Hotels and Motels, Rentals, and Timeshares. **Table 28** includes STR listings by neighborhood in the City from 2020-2024 and illustrates significant concentrations within high tourist areas, predominantly located in the Central Business District, Central City, Mid-City, and the Lower Garden District.

TABLE 28: RENTAL LISTINGS BY NEIGHBORHOOD, 2020-2024[76]

NEIGHBORHOOD	2020		2021		2022		2023		2024		5 YEAR TOTAL[77]	
	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR
CBD	29	1	283	0	306	1	145	0	184	0	947	2
CENTRAL CITY	29	7	103	36	110	74	126	43	155	14	523	174
MID-CITY	10	6	96	36	90	58	106	31	119	21	421	152
LOWER GARDEN DISTRICT	3	3	54	20	69	26	48	19	84	3	258	71
MARIGNY	6	12	60	38	59	56	65	32	57	5	247	143
SEVENTH WARD	4	6	52	37	79	85	34	54	75	22	244	204
ST. CLAUDE	3	5	51	23	64	47	41	22	39	13	198	110
TULANE - GRAVIER	0	3	29	9	44	21	50	15	55	6	178	54
BYWATER	2	9	23	29	30	40	21	18	42	10	118	106
TREME - LAFITTE	0	13	22	38	34	70	19	42	36	9	111	172
WEST RIVERSIDE	3	4	13	14	33	20	23	10	33	8	105	56
MILAN	0	0	12	16	27	29	19	21	27	7	85	73
ST. THOMAS DEV	0	2	19	4	17	5	11	0	20	1	67	12
EAST RIVERSIDE	0	1	8	16	17	17	9	7	17	7	51	48
UPTOWN	3	2	12	17	16	19	5	23	14	9	50	70
FRERET	0	1	15	8	13	12	4	6	11	5	43	32
LAKE CATHERINE	0	0	6	1	14	1	9	1	13	0	42	3
IRISH CHANNEL	0	2	11	17	13	34	5	16	12	5	41	74
ALGIERS POINT	0	2	6	10	6	12	12	9	10	4	34	37
BAYOU ST. JOHN	3	4	2	24	7	37	10	27	11	16	33	108
ST. ROCH	0	1	6	18	15	41	5	20	7	10	33	90
LEONIDAS	0	2	7	14	5	20	6	14	7	7	25	57

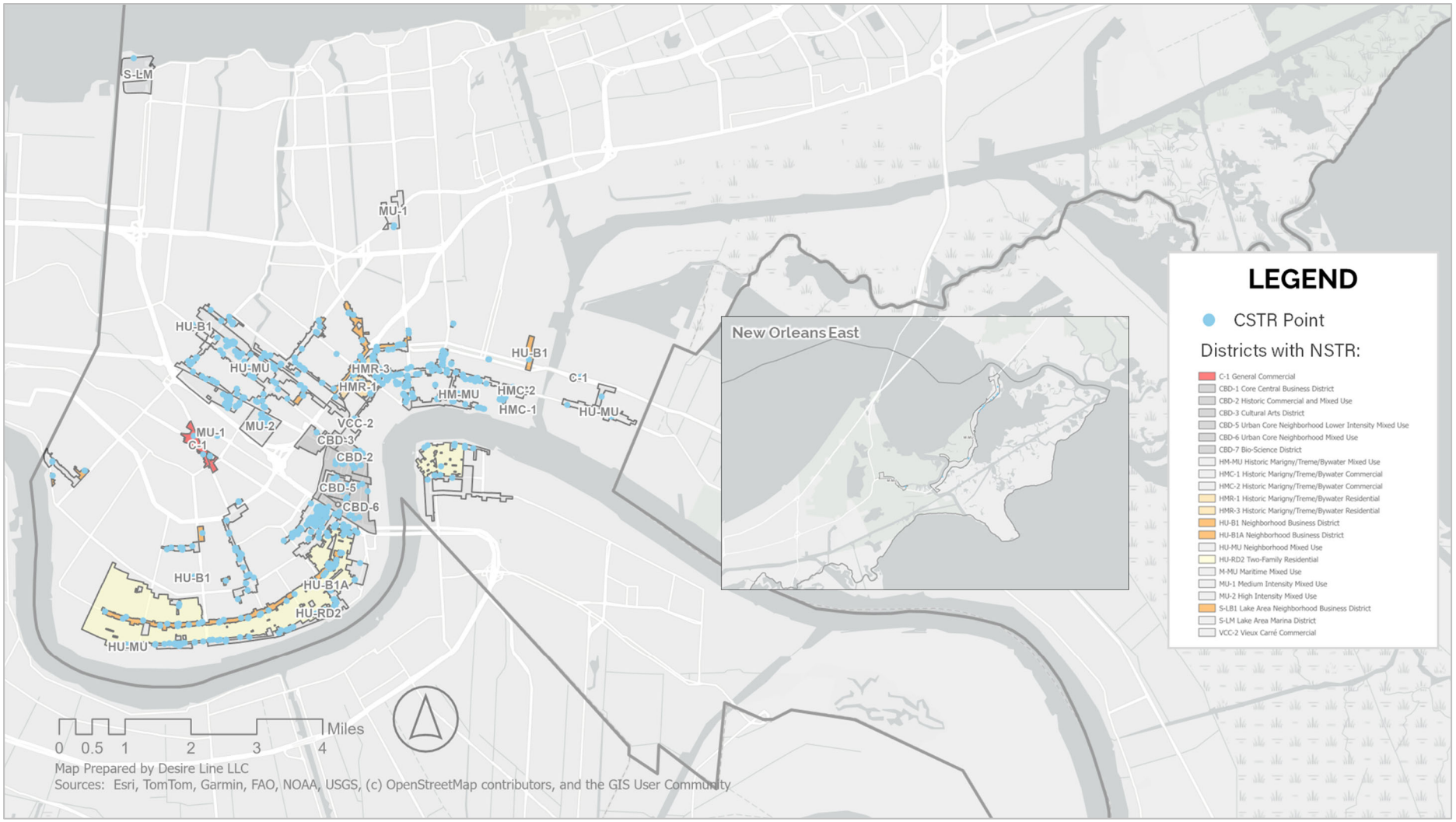
[76] City of New Orleans Permit Data, 2020-2024
[77] The 5 year total includes both new permits and renewals

NEIGHBORHOOD	2020		2021		2022		2023		2024		5 YEAR TOTAL[77]	
	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR
MCDONOGH	0	1	2	5	5	6	3	3	2	5	12	20
TOURO	0	0	2	1	5	11	2	7	3	3	12	22
AUDUBON	0	4	2	27	2	31	5	26	3	11	12	99
HOLY CROSS	0	0	0	4	4	11	2	4	3	6	9	25
FAIRGROUNDS	0	3	3	18	4	25	0	16	2	6	9	68
WHITNEY	0	1	0	2	2	6	3	1	2	0	7	10
GERT TOWN	0	0	1	2	4	1	1	2	1	1	7	6
CITY PARK	0	2	2	14	4	22	0	13	1	3	7	54
WEST END	0	0	2	3	3	7	1	6	1	2	7	18
LOWER NINTH WARD	0	1	0	2	1	4	3	1	2	3	6	11
FRENCH QUARTER	1	0	1	0	1	1	1	0	1	0	5	1
DILLARD	0	2	0	5	2	10	0	6	2	5	4	28
BEHRMAN	0	2	1	3	0	6	1	4	0	1	2	16
BROADMOOR	0	6	0	24	1	34	0	21	0	12	1	97
TALL TIMBERS - BRECHTEL	0	0	0	2	0	5	1	2	0	2	1	11
U.S. NAVAL BASE	0	0	0	0	1	1	0	0	0	0	1	1
FLORIDA DEV	0	0	0	0	0	0	0	0	0	0	0	0
DIXON	0	0	0	0	0	3	0	1	0	2	0	6
B. W. COOPER	0	0	0	0	0	0	0	0	0	0	0	0
READ BLVD EAST	0	1	0	2	0	4	0	1	0	1	0	9
VIAVANT - VENETIAN ISLES	0	0	0	0	0	0	0	0	0	0	0	0
EAST CARROLLTON	0	0	0	11	0	14	0	11	0	5	0	41
HOLLYGROVE	0	1	0	3	0	7	0	7	0	4	0	22
NAVARRE	0	1	0	8	0	3	0	4	0	4	0	20
MILNEBURG	0	0	0	5	0	10	0	3	0	3	0	21
IBERVILLE	0	0	0	0	0	0	0	0	0	0	0	0
LAKEWOOD	0	0	0	0	0	0	0	0	0	2	0	2
GARDEN DISTRICT	0	1	0	1	0	1	0	0	0	0	0	3
LAKESHORE - LAKE VISTA	0	0	0	0	0	0	0	0	0	0	0	0

NEIGHBORHOOD	2020		2021		2022		2023		2024		5 YEAR TOTAL[77]	
	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR	CSTR	NSTR
LAKE TERRACE & OAKS	0	0	0	1	0	1	0	0	0	0	0	2
DESIRE AREA	0	0	0	0	0	1	0	1	0	0	0	2
MARLYVILLE - FONTAINEBLEAU	0	2	0	7	0	23	0	14	0	5	0	51
LAKEVIEW	0	0	0	5	0	7	0	5	0	5	0	22
ST. BERNARD AREA	0	0	0	2	0	6	0	1	0	0	0	9
VILLAGE DE LEST	0	0	0	0	0	1	0	1	0	0	0	2
WEST LAKE FOREST	0	0	0	1	0	2	0	0	0	0	0	3
OLD AURORA	0	3	0	6	0	9	0	2	0	2	0	22
FILMORE	0	1	0	8	0	4	0	4	0	6	0	23
FLORIDA AREA	0	1	0	1	0	3	0	0	0	2	0	7
PLUM ORCHARD	0	0	0	1	0	1	0	0	0	0	0	2
BLACK PEARL	0	1	0	5	0	2	0	5	0	2	0	15
ST. ANTHONY	0	1	0	2	0	5	0	3	0	4	0	15
FISCHER DEV	0	0	0	0	0	0	0	0	0	1	0	1
PONTCHARTRAIN PARK	0	0	0	0	0	2	0	0	0	2	0	4
LITTLE WOODS	0	1	0	5	0	14	0	7	0	5	0	32
GENTILLY TERRACE	0	2	0	13	0	18	0	12	0	6	0	51
READ BLVD WEST	0	0	0	0	0	0	0	0	0	0	0	0
NEW AURORA - ENGLISH TURN	0	0	0	1	0	0	0	0	0	1	0	2
PINES VILLAGE	0	0	0	1	0	2	0	0	0	0	0	3
GENTILLY WOODS	0	0	0	1	0	3	0	1	0	2	0	7
TOTAL	96	124	906	627	1107	1052	796	625	1051	306	3956	2734

Figure 23 illustrates the location of active CSTRs by zoning district in the City.

FIGURE 23: ACTIVE COMMERCIAL SHORT-TERM RENTAL PERMITS BY ZONING DISTRICT



Details in **Figure 23** are also provided in **Table 29** to support additional analysis.

TABLE 29: ACTIVE CSTR PERMITS BY ZONING DISTRICT

District	Description	Count	% of Total
C-1	General Commercial	5	0.44%
CBD-1	Core Central Business	45	3.95%
CBD-2	Historic Commercial and Mixed Use	30	2.64%
CBD-3	Cultural Arts	65	5.71%
CBD-5	Urban Core Neighborhood Lower Intensity Mixed Use	66	5.80%
CBD-6	Urban Core Neighborhood Mixed Use	55	4.83%
CBD-7	Bio-Science	1	0.09%
HMC-1	Historic Marigny/Treme/Bywater Commercial	41	3.60%
HMC-2	Historic Marigny/Treme/Bywater Commercial	115	10.11%
HM-MU	Historic Marigny/Treme/Bywater Mixed Use	35	3.08%
HMR-1	Historic Marigny/Treme/Bywater Residential	1	0.09%
HMR-2	Historic Marigny/Treme/Bywater Residential	0	0.00%
HMR-3	Historic Marigny/Treme/Bywater Residential	1	0.09%
HU-B1	Neighborhood Business	124	10.90%
HU-B1A	Neighborhood Business	7	0.62%
HU-MU	Neighborhood Mixed Use	332	29.17%
HU-RD1	Two-Family Residential	0	0.00%
HU-RD2	Two-Family Residential	8	0.70%
M-MU	Maritime Mixed Use	15	1.32%
MU-1	Medium Intensity Mixed Use	60	5.27%
MU-2	High Intensity Mixed Use	128	11.25%
S-LB1	Lake Area Neighborhood Business	2	0.18%
S-LM	Lake Area Marina	1	0.09%
VCC-2	Vieux Carre Commercial	1	0.09%
	Total	**1138**	**100.00%**

Figure 23 and **Table 29** show higher concentrations of active, permitted CSTRs within the Historic Marigny/Tremé/Bywater Commercial District, the Neighborhood Business District, the Neighborhood Mixed Use District (outlined with a thick red border in **Table 26**), and the High Intensity Mixed Use District. CSTRs are also particularly prevalent in both Downtown and Uptown within these districts. Of note, there are also active CSTRs located within single-family, two-family, and lower intensity mixed use districts.

Figure 24 depicts active NSTR permits by zoning district. They are located throughout the City, with concentrations in the Uptown, Downtown, and Mid-City areas. They are mostly in residential districts with some located in commercial districts.

FIGURE 24: ACTIVE NSTR PERMITS BY ZONING DISTRICT

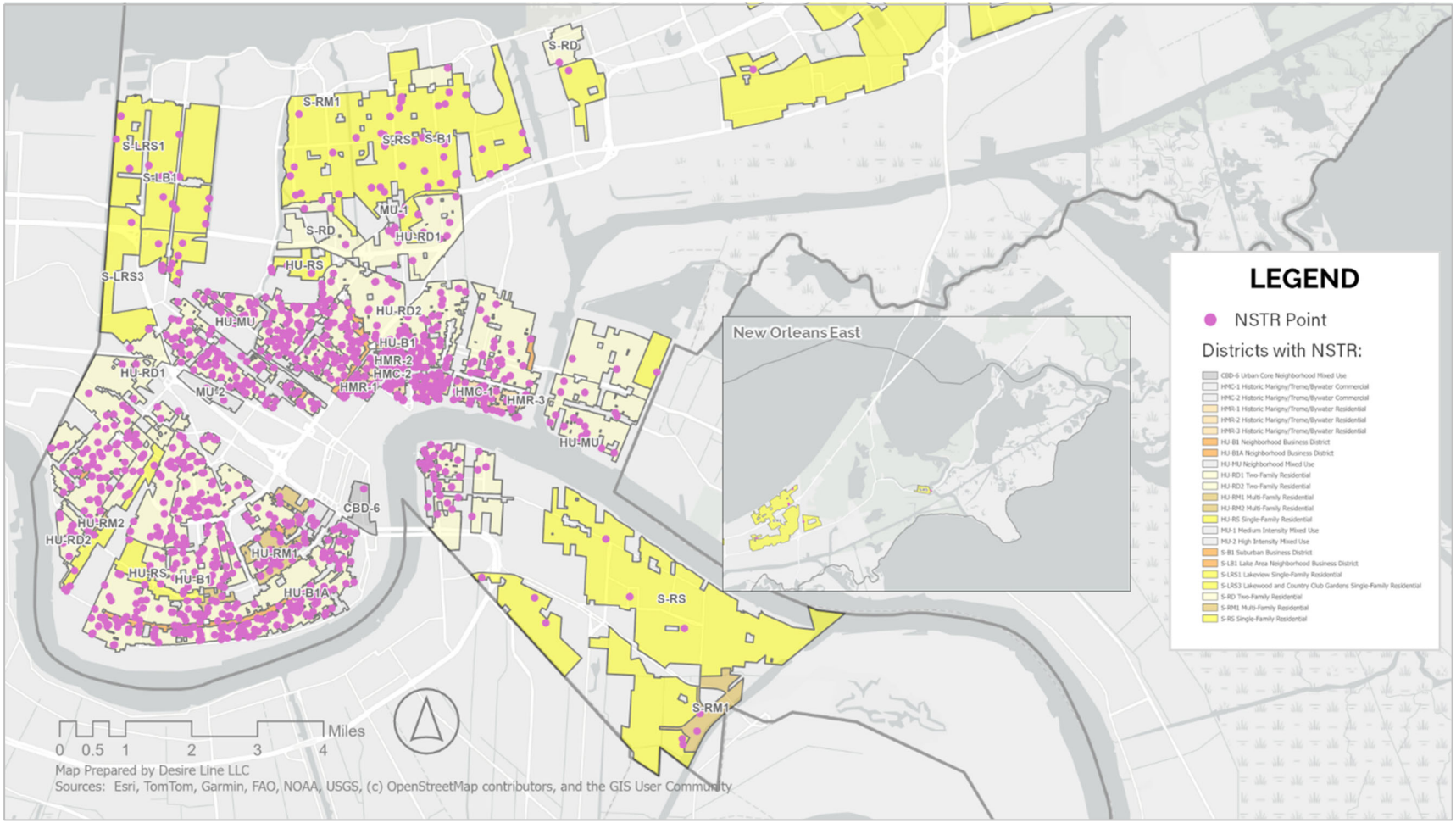


Figure 25 shows the active Hotel and Motel permits in the City. Hotels and Motels are mostly concentrated Downtown and in the Central Business District, with additional permits Uptown, in Mid City, and in the Marigny and New Orleans East. They are also concentrated in commercial and mixed-use areas of the City.

FIGURE 25: ACTIVE HOTEL AND MOTEL PERMITS BY ZONING DISTRICT

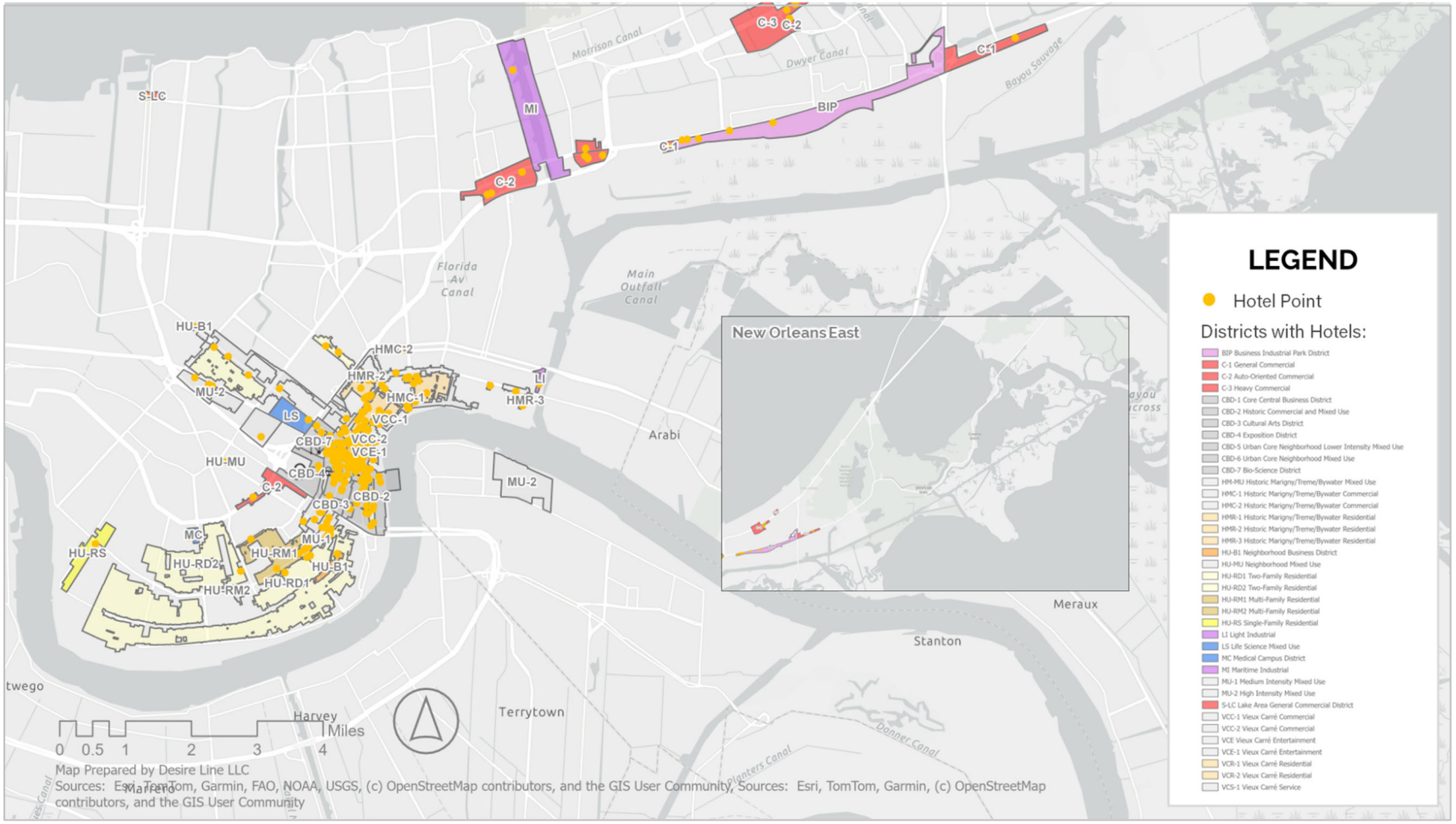
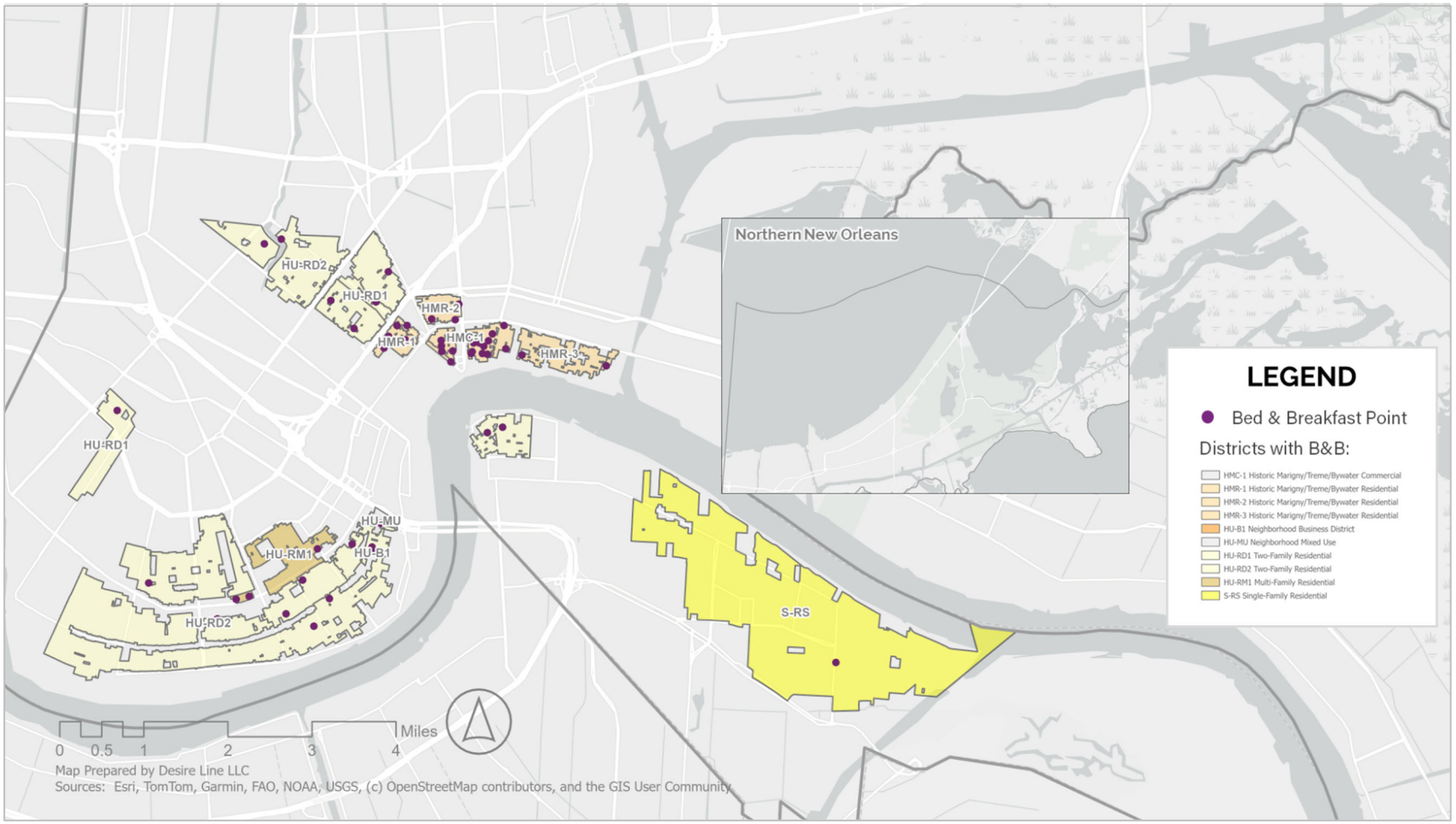


Figure 26 depicts the active Bed and Breakfast permits in the City. A majority of the permits are in the Marigny, with additional locations Uptown, in Algiers, and in Mid City. They are located in both commercial and residential districts, but the majority are in residential districts.

FIGURE 26: ACTIVE BED AND BREAKFAST PERMITS BY ZONING DISTRICT

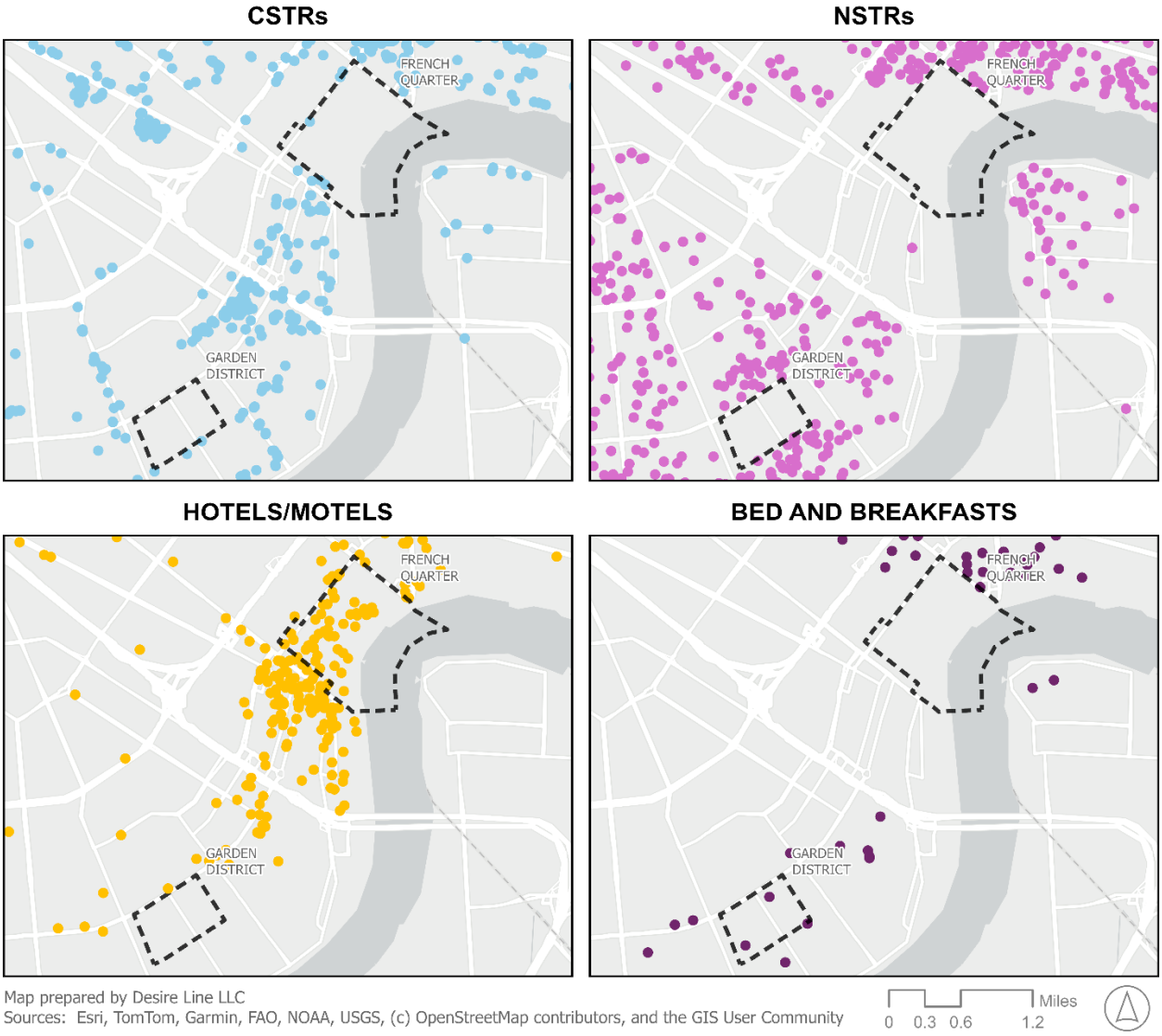


While Bed and Breakfasts and NSTRs are located primarily in residential areas, CSTRs and Hotels and Motels are concentrated in commercial and mixed-use areas. However, the highest concentration of transient lodging uses is in the tourist heavy areas of the City, including the French Quarter and Lower Garden District. The next section will examine these neighborhoods more closely.

6.8 The French Quarter and Garden District

Figure 27 highlights transient lodging uses in the French Quarter and Garden District areas. In these areas, transient lodging uses are prohibited, except within the VCE Vieux Carré Entertainment District. The largest clusters of transient lodging uses are found in the neighborhoods adjacent to the French Quarter and Garden District, the Central Business District, Central City, Uptown, Marigny, and Bywater areas, reflecting that the prohibition of transient lodging uses in the French Quarter and Garden District may oversaturate transient lodging uses in nearby neighborhoods.

FIGURE 27: TRANSIENT LODGING USES: FRENCH QUARTER AND GARDEN DISTRICT



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APPENDIX B

COMMUNITY OUTREACH ANALYSIS

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1. Community Outreach Analysis

1.1 Methodology and Outreach

A need for more robust outreach and engagement was identified in March 2025, in response to the data limitations discussed in **Appendix A – Background & Data Analysis**. These data limitations include but are not limited to: (1) a high rate of illegal rentals not accounted for in the city's permit database, (2) the lack of a comprehensive dataset that could be relied upon consistently over the last 10 years[1], (3) difficulty in ascertaining how data was comprehensively manifesting across city neighborhoods and the level of land use variation across residents and businesses' experience of transient lodging uses. These findings and the high rate of public engagement that took place as part of previous study public hearings necessitated a heightened level of civic engagement. The outreach and engagement methodology described herein is intentional in its design to capture participants' lived experience of transient lodging uses in the city, and their perceptions of these uses generally. To fully inform Study recommendations, this qualitative information is coupled with qualitative information discussed in **Appendix A – Background & Data Analysis**.

The Project Team used a variety of outreach methods to reach stakeholders. These methods included a Study introductory presentation and website launched as part of a regular City Planning Commission Meeting on April 8, 2025, followed by focus groups, a community survey, and interviews with interested stakeholders. The focus groups were conducted online and in person, the community survey was conducted online, and the interviews were conducted via virtual meeting.

The invite to the focus groups was sent to the 537 people who signed up for project notifications via the project website and through a flyer distributed via the Office of Neighborhood Engagement. The focus groups were organized by (1) Affordable Housing and Neighborhood Character, (2) Economic Development, and (3) Permitted Uses and Nuisance Regulations. A total of 68 participants attended focus group meetings (including online and in person attendees). All the focus groups were made up of primarily City residents, and every group included people with opposing viewpoints, which resulted in nuanced and productive regulatory discussions and considerations.

The Project Team installed 31 total yard signs with information about the Study and the community survey at fire stations across the City of New Orleans between April 7th through April 9th which coincided with the introductory Study presentation to the City Planning Commission at their April 8th public hearing. At this meeting, the Project Team requested that the public take and share information about the community survey and project website. The Project Team distributed links to the community survey and project website via emails to a project notification list maintained by the City. A total of 1,261 respondents completed the survey, the majority of which were New Orleans residents. The community survey used the Survey123 program by Esri, and only allowed for one response per submitter, limiting "spam" or "bot" entries and ensuring all entries were unique.

Interview stakeholders were identified by the City, Study participants, focus group participants, and self-identified through the public project website contact form. A total of 31 stakeholders participated in 21 separate stakeholder interviews. The interviewees included representatives from real estate, development, banking industries, housing advocates, economic development professionals, neighborhood associations, Short Term Rental owners and operators, and hotel industry professionals.

[1] The illegal listings were updated in August 2025 to show a large reduction in illegal listings due to the platforms removing those listings.

In addition to the stakeholder interviews, the Project Team received public comments from interested parties via email and though the project website; these responses were coded based on positive or negative sentiment about CSTRs.

1.2 Key Findings

Focus Groups

Focus group discussions centered around regulations, enforcement, the density of transient lodging uses, and housing affordability. Focus group participants emphasized the need for simplification of the regulations and improvements to enforcement of the current regulations, with an emphasis on Non-Commercial Short Term Rentals. They noted the importance of attracting revenue for the City from tourism, while retaining local businesses and neighborhood character. They also noted the broader need to reduce the cost of development and support increased development of affordable housing in the City. Focus group attendees spoke to the importance of examining individual neighborhood needs, density and use standards for transient lodging uses, and the importance of keeping housing affordability and displacement in mind. Additionally, they highlighted the need to use transient lodging fees to promote and support the development of affordable long-term housing for City residents.

Community Survey

The community survey provided detailed, neighborhood-level data on resident experiences, perceptions, concerns, and challenges related to transient lodging uses. Survey responses were generally concentrated in areas or neighborhoods with a high concentration of STRs. Four themes emerged as resident concerns: (1) quality of life and loss of neighborhood character, (2) displacement of City residents due to unaffordability, (3) density of STRs in the community, and (4) regulation and enforcement. Analysis of the survey results showed little difference between homeowner and renter cohorts for most questions, with two notable exceptions: experiencing negative impacts due to STRs, and recommended areas of focus for CSTR regulatory improvement. Renters in the survey were overall more concerned about negative impacts of CSTRs than homeowners. In the aggregate review, 67.33% of renters said they were "very concerned" about assorted negative impacts, while only 45.09% of homeowners were "very concerned." The order of regulatory improvement priorities remained the same for both owners and renters, but the intensity of concern for each issue was greater among the renter cohort (example: "preserving housing for people who live in New Orleans all year" was the top priority for both cohorts, but 86.24% of renters felt this way, compared to only 52.62% of owners; 83.33% of renters felt "stopping the operation of illegal CSTRs was the second priority, and while owners agreed it was the next priority, only 68.45% of them stated so).

The topic of regulations and enforcement also revealed a pronounced divide in perspectives between two other cohorts within the survey: respondents who currently or previously owned a Commercial Short-Term Rental (CSTR) and those who did not. While the broader group shared concerns about enforcement and neighborhood impacts, CSTR owners consistently expressed a more favorable view of the role CSTRs play in the city's housing market and local economy. When asked about CSTRs and existing housing stock, 77.27% of current or former CSTR owners stated that CSTRs help promote reinvestment in the housing stock, compared to only 20.80% of non-owners who agreed with this assertion. A similar pattern emerged around economic opportunity: 63.64% of CSTR owners said CSTRs provide business opportunities for locals that would not otherwise exist through other types of transient lodging, while just 18.07% of non-CSTR owners and renters agreed. Additionally, 70.45% of current or former CSTR owners stated that CSTRs help support and grow local businesses, compared to only 17.48% of non-owners.

Stakeholder Interviews

Topics of discussion throughout the stakeholder interviews generally centered around the following: 1) a need for clarification in STR regulations, 2) a need for increased enforcement of STR regulations, and 3) the importance of economic development for the City. Interview responses highlighted a need to examine transient lodging uses based on occupancy and scale while streamlining regulatory requirements and simplifying use standards. The interviews revealed the nuances needed in regulatory changes related to density, zoning, and onsite operators. Many interviewees stated that there should not be regulatory differences by neighborhood but agreed that transient lodging uses belong in commercial and mixed-use districts. The majority of interview participants agreed that transient lodging use fees should be connected to affordable housing, and that hosting platforms should be regulated more thoroughly.

2. Focus Group Analysis

2.1 Generally

Outreach associated with this Study allowed any member of the public to sign up for project notifications via the project website at any point in the Study's planning process. This notification list was utilized by the Project Team to send invitations for focus groups and to share a focus group flyer. The focus groups were organized by the topics of (1) Affordable Housing and Neighborhood Character, (2) Economic Development, and (3) Permitted Uses and Nuisance Regulations. They were offered both online and in person. The in-person focus groups were offered at the Milton H. Latter Library, the Rosa F. Keller Library, and the Algiers Regional Library.

TABLE 1. FOCUS GROUP TOPICS AND DATES

FOCUS GROUP	MEETING DATE
Affordable Housing and Neighborhood Character	May 7th (online) May 8th (in person)
Economic Development	May 13th (online) May 14th (in person)
Permitted Uses and Nuisance Regulations	May 15th (online) May 15th (in person)

A total of 68 participants attended either online or in person focus group meetings. When attendees could not communicate all of their feedback as part of the focus group, the Project Team followed up with these attendees by scheduling one-on-one stakeholder interviews. The Project Team provided written information on the Study's context and preliminary findings from a sample of the Survey responses collected from May 8 – April 22 (608 responses) to all focus group attendees.

2.2 Affordable Housing and Neighborhood Character

Attendees of the Affordable Housing and Neighborhood Character focus groups discussed how the Study could relate to housing affordability and the character of neighborhoods. Attendees agreed that Bed and Breakfasts can be integrated into neighborhoods with minimal negative impacts; however, they generally understood that these uses, when in a residential area, are required to have an onsite operator. Attendees acknowledged that hotels are different from CSTRs because they visually appear like a more traditional commercial use, but they noted that hotels also must have an onsite operator in order to be safe and functional.

"Saying that you don't have to have anybody on site in the Quarter is a very bad idea."

Attendees of the focus group posited that CSTRs have begun to "price out" long-term housing (by leading to higher long-term rent rates), affecting the neighborhood fabric negatively. Some attendees asserted that CSTRs can be helpful in providing economic opportunities and revitalizing blighted areas by subsidizing maintenance costs for aging building stock. Some focus group attendees recommended that the 25% cap on STR units in a single building be maintained, and that blighted areas could be rehabilitated with that regulation. Some attendees asserted that CSTRs bring customers to local businesses, while some attendees disputed this assertion. There was partial consensus among attendees in asserting that the density and concentration of CSTRs is an acute problem, and further that the use of whole multi-unit buildings and CSTR ownership by corporate entities has led to negative land use impacts. Many attendees supported the idea of a "one STR per block" limit and noted that the City should consider this rule for CSTRs. Some focus group attendees also acknowledged that on-site operator requirements for small-scale CSTRs could be challenging for non-corporate operators.

Many focus group attendees broadly acknowledged enforcement and permitting issues related to STRs. Attendees' comments regarding enforcement generally focused around STRs presenting nuisance and safety issues and many attendees pointed to STR units that are illegally operating or lacking a City permit as the cause of many issues. Attendees generally recommended that STR owners be held accountable for nuisances and illegal listings, and that these units sometimes are improperly managed, presenting an opportunity for criminal activity or loud partying. Attendees emphasized the need to streamline and simplify regulations.

Participants of these focus groups emphasized rising rents in the City. These attendees noted that there are many factors that are leading to a lack of affordable housing, including insurance costs and flooding, but that CSTRs may be a factor as well. Although many attendees were conflicted on whether they believed that CSTRs were directly correlated to a lack of affordable housing, they recommended that transient lodging fees go towards affordable housing and enhanced enforcement.

The Affordable Housing and Neighborhood Character focus groups underlined the need for enforcement and simplification of regulations, while retaining local businesses and neighborhood character. The discussion also spoke to the importance of examining density and use standards for transient lodging uses.

2.3 Economic Development

This series of focus groups examined the Study through the lens of economic development. Attendees first focused on transient lodging uses in general, pointing out that a "one size fits all approach" does not work for transient lodging use regulations, as commercially zoned and residentially zoned properties are inherently different. Attendees generally had consensus in recommending that higher density lodging uses be allowed in mixed use areas and areas in need of investment, but that strict regulation is needed in residential and historic districts. Attendees asserted that transient lodging uses are appropriate in commercial zones where businesses already exist, rather than in areas with neighborhood serving businesses or residential and historic areas, as that could compromise current neighborhood character and local culture. Participants also acknowledged that some residents may not be aware of where zoning districts are located in their neighborhood, and what uses are currently allowed in those districts.

Some attendees asserted that existing dwelling units in the City used as CSTRs were created solely to be used as CSTRs or condominiums serving as second homes for those who may wish to have a part-time home in the City and are not ideal for long term primary housing. Some attendees asserted that some property owners have used CSTRs to fund building repairs and maintenance in formerly blighted areas. Some attendees further stated that CSTRs are an essential use for residents seeking to offset housing, insurance, and renovation costs, and to provide a higher return on investment than that generated by long term rental rates. Attendees highlighted the importance of grandfathering in existing transient lodging uses if regulations change, but also noted that the proliferation of STRs can create areas without long-term residents.

Some attendees noted that illegal STR units present a significant problem in the City, and there was general consensus on the need for good managers and operators. Many attendees noted that increased regulations could negatively impact the owners of transient lodging uses who follow the rules, and that regulations should be consistent over time.

"A lot of the problems that we're all responding to is before they [the City] started taking a lot of these measures in these residential areas."

"As a neighbor, you don't understand what is legal and what is illegal."

Focus group participants discussed transient lodging use fees, asserting that fees should be used for affordable housing, neighborhood investment, enforcement, licensing, and permitting, and the use of these fees should be tracked and reported. Many attendees emphasized that they were not aware of how the current fees are collected or what they contribute to. However, they asserted that the Mandatory Inclusionary Zoning program, which requires the inclusion of affordable housing units, has had limited impact in expensive commercialized areas where there is a higher demand for transient lodging uses.

The Economic Development focus group attendees emphasized the importance of attracting tourism to the City to offset the cost of development and housing repairs and maintenance in general, through using transient lodging uses to offset these costs. They also generally supported increased enforcement of the current regulations and the need to examine transient lodging uses on an individual zoning district basis.

2.4 Permitted Uses and Nuisance Regulations

This series of focus groups discussed the Study's relation to permitting and the regulation of nuisances. When discussing transient lodging uses in general, attendees expressed the need for a neighborhood-specific approach to the regulatory environment. Participants further emphasized the impact of high-density transient lodging uses, as well as the placement of transient lodging uses in mixed-use areas close to residential neighborhoods. Attendees recommended stricter regulations in historic core neighborhoods and low-density residential zones, but agreed commercial and mixed-use zones are suitable for transient lodging uses if capped and regulated, by district, number of rooms, or both. Attendees also acknowledged the tension between maintaining housing for City residents and providing space and income generation for tourism-based uses.

"I think density is one thing. We should look at areas that have entire block faces of CSTRs and use those as a potential starting point to roll back."

Focus group attendees stressed the need for increased code enforcement regarding STRs, particularly in historic core neighborhoods during nights and weekends. They further noted the proliferation of illegal units in their neighborhoods, and that grandfathered permits add to this problem. Participants further emphasized that more clarity in both the regulations and enforcement would be helpful. The attendees recommended that CSTRs have better management, with either onsite operators or nearby contacts to address safety and nuisance issues and asserted that STR owners and operators should be held accountable for code violations and illegal units. Attendees noted that residents living near STRs are burdened by the need to monitor and report issues with these uses if the City and hosting platforms are not monitoring them and criticized the City's focus on bringing uses into compliance rather than revoking licenses.

"I mean if the city is not going to inspect and look at it and enforce the rule. I think it's a waste to a lot of people's time if it's not going to be enforced and inspected."

Attendees of this focus group noted that the City should try to evaluate potential displacement of residents by transient lodging uses and noted that there is a need for an analysis of transient lodging uses by zip code or neighborhood. They pointed out that transient lodging uses make it harder to provide housing for long-term rentals and further emphasized the need to use transient lodging fees for affordable housing.

"If you're looking at a neighborhood that already has 6,000 hotel rooms and 3,000 residents, maybe you're kind of already at that tipping point. I think that conserving the...character of all neighborhoods in New Orleans is important."

The Permitted Uses and Nuisance Regulations focus groups stressed the importance of examining transient lodging uses at the neighborhood level while keeping affordability and displacement in mind. They further underlined the need for less permissive regulations for residential and historic core neighborhoods, as well as the necessity of effective and transparent enforcement for illegal uses.

3. Community Survey Analysis

3.1 Generally

The Project Team hosted an online community survey open to all residents and members of the public to document community members' experiences with and perceptions of transient lodging uses in their neighborhoods and across the City. The community survey collected qualitative data analyzed in conjunction with quantitative data analyzed in **Appendix A**. The following sections explore the survey outreach and results in detail.

3.2 Survey Outreach

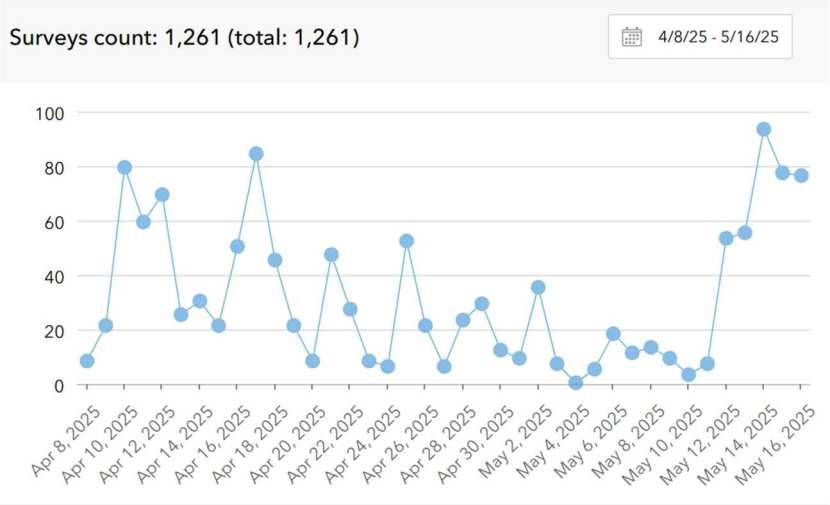
The Project Team placed signs encouraging residents to take the survey at fire stations across the City of New Orleans and attended a Planning Commission hearing to request that the public disseminate information about the community survey. The Project Team also sent a digital link to the community survey and project website to all members on the project notification list maintained by the City. In total, the Project Team sent out five email blasts, shown in **Table 2** below, along with the correlating volume of website views and survey participation. A total of 1,261 people responded to the survey.

TABLE 2. SURVEY OUTREACH AND PARTICIPATION

EMAIL DATE	INTERNAL EMAIL TITLE	RECIPIENTS	SURVEY CLICKS
April 25, 2025	New Orleans Transient Lodging Study Kickoff	514 (351 opened)	116, 39 unique
April 28, 2025	New Orleans Transient Lodging Study Kickoff #2 – Additional People	23 (9 opened)	2, 1 unique
May 2, 2025	New Orleans Transient Lodging Study Focus Groups	601 (360 opened)	29 total, 4 unique
May 12, 2025	New Orleans Transient Lodging Study – Remaining Focus Groups & Survey Close Date	671 (395 opened)	9 total, 8 unique
May 14, 2025	New Orleans Transient Lodging Study Survey Closing on May 16th	739 (383 opened)	48 total, 33 unique

Total clicks are the overall number of clicks; unique are how many individuals clicked the link.

FIGURE 1. SURVEYS COMPLETED PER DAY



The following four subsections (3.3, 3.4, 3.5, and 3.6) include an analysis of select, relevant surveys completed from all respondents (i.e., Section 3.3 General Cohort Profile); as well as an analysis of Renter and Homeowner Cohorts (Section 3.4); CSTR Owner and Non-Owner Cohorts (Section 3.5), and a comprehensive analysis focused on STR impact by neighborhood focused on better understanding their relative impacts across the city.

3.3 General Cohort Profile

Residents and Non-residents

1,168 respondents (92.6%) identified as residents of New Orleans. Among non-residents, the primary reasons for participation were owning property in the city (63 respondents; 5.0%) and having previously lived in the city (14 respondents; 1.10%).

Housing Type

Of those respondents who identified as living in New Orleans, 799 (68.41%) are homeowners and 365 (31.3%) are renters. Compared to the City's population, homeowners are overrepresented in the survey. Per 2023 American Community Survey data, 56% of households in the City are homeowner occupied.

Neighborhoods

The survey received responses from residents in 58 of the City's 71 neighborhoods.[2] The four neighborhoods with the most responses (Marigny 91; Bywater 91; French Quarter 58; Seventh Ward 58) represent 20.5% of all responses from New Orleans residents. Thirteen neighborhoods received no responses, which coincides with a very low level of transient lodging use in these neighborhoods. 176 respondents identified themselves as living in New Orleans but did not share their location.

TABLE 3. SURVEYS RECEIVED BY NEIGHBORHOOD

MARIGNY	91	MILAN	12	HOLLYGROVE	2
BYWATER	91	TOURO	12	OLD AURORA	2
FRENCH QUARTER	58	GENTILLY TERRACE	9	ST. ANTHONY	2
SEVENTH WARD	58	LAKE CATHERINE	9	TALL TIMBERS - BRECHTEL	2
MID-CITY	52	BROADMOOR	9	PONTCHARTRAIN PARK	2
BAYOU ST. JOHN	45	LITTLE WOODS	8	MILNEBURG	1
IRISH CHANNEL	40	NAVARRE	8	ST. BERNARD AREA	1
CITY PARK	38	LAKEVIEW	8	LOWER NINTH WARD	1
CENTRAL CITY	38	LAKESHORE - LAKE VISTA	6	WEST LAKE FOREST	1
TREME - LAFITTE	36	MARLYVILLE - FONTAINEBLEAU	5	LAKEWOOD	1
ST. CLAUDE	35	ST. THOMAS DEV	5	DESIRE	0
LOWER GARDEN DISTRICT	29	FRERET	5	FISCHER DEVELOPMENT	0
ST. ROCH	28	LAKE TERRACE & OAKS	5	GENTILLY WOODS	0
AUDUBON	27	WEST END	4	GERT TOWN	0
UPTOWN	21	McDONOGH	3	IBERVILLE	0
LEONIDAS	19	BEHRMAN	3	NEW AURORA/ ENGLISH TURN	0
WEST RIVERSIDE	18	DILLARD	3	PINES VILLAGE	0
ALGIERS POINT	18	BLACK PEARL	3	PLUM ORCHARD	0
CBD	17	WHITNEY	3	READ BLVD EAST	0
EAST RIVERSIDE	16	B. W. COOPER	2	READ BLVD WEST	0

[2] As defined by The Data Center's 2020 neighborhood boundaries.

HOLY CROSS	14	FLORIDA AREA	2	US NAVAL SUPPORT AREA	0
FAIRGROUNDS	14	DIXON	2	VIAVANT/VENETIAN ISLES	0
TULANE – GRAVIER	13	HOLLYGROVE	2	VILLAGE DE L'EST	0
GARDEN DISTRICT	13	OLD AURORA	2	(NEIGHBORHOOD UNKNOWN)	176
EAST CARROLLTON	13	ST. ANTHONY	2		

Prevalence of STR Ownership

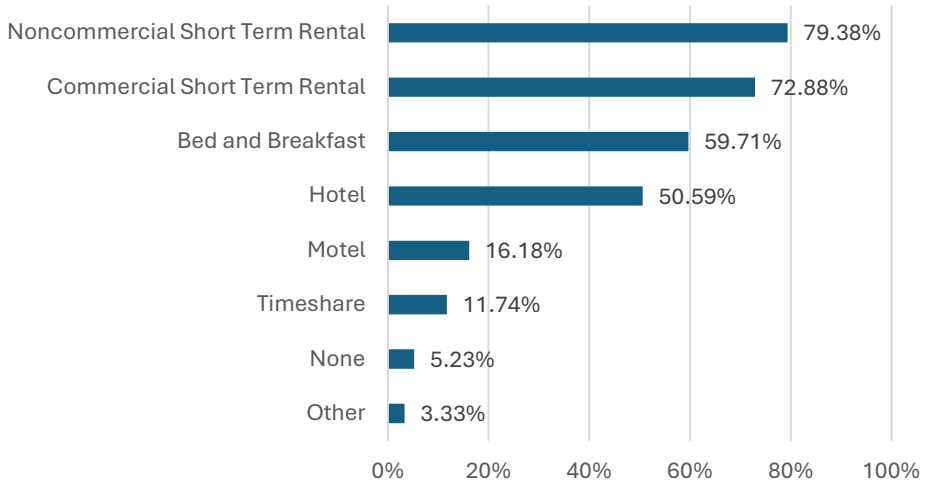
135 (10.7%) respondents reported owning one or more short-term rental units, 21 (1.7%) respondents had previously owned an STR, and 1,184 (93.9%) had never owned an STR. While the number of individuals who own STRs in the city is not known, the survey population likely overrepresents STR owners as compared to the City's total adult population by more than 5 times. Granicus data identifies 3,634 unique STR owners, of which 695 (19.1%) are reported as LLCs and 2,939 (80.9%) are reported as natural persons. 2,406 additional units are of unknown ownership at the time of this analysis. LLCs may each be owned by one or more individuals, and an individual may own multiple LLCs, making it difficult to determine the true prevalence of STR ownership amongst the city's population. Assuming each LLC represents one unique owner, STR owners may be overrepresented in the survey by as much as 6.8x compared to the city's total population of STR owners.

Types of Lodging Uses

NCSTRs and CSTRs were reported to be the most prevalent types of transient lodging uses located in respondents' neighborhoods (79.38% and 72.88% respectively), and more than half of respondents stated they noticed single family homes, apartment complexes, or apartments located above a business being converted into CSTRs or Bed Breakfasts.

FIGURE 2. TRANSIENT LODGING USES WITHIN WALKING DISTANCE

Question: Select all transient lodging uses currently located within walking distance of the area where you liv



3.4 Renter and Homeowner Cohorts

Survey results were analyzed based on housing use type or in other words: whether the respondent is a homeowner or renter. These groups had markedly different experiences as detailed below.

Experience with Negative Impacts

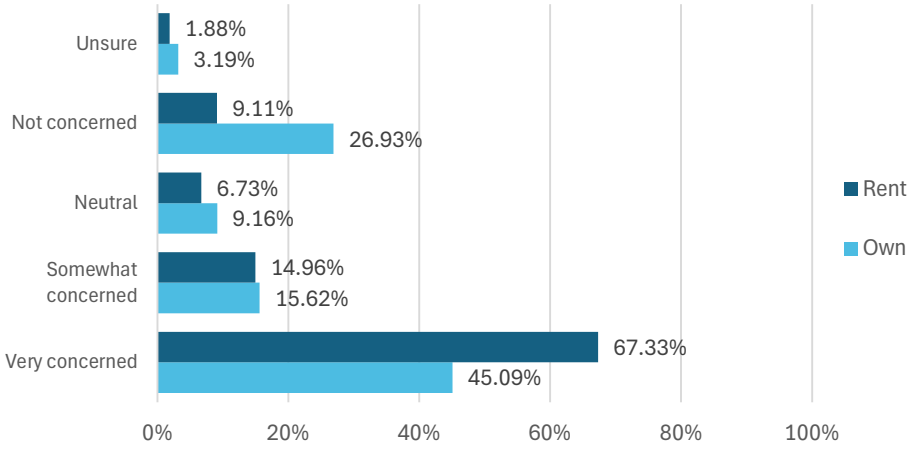
Respondents indicated whether they had experienced negative impacts of CSTRs and how concerned they were about these effects. These negative outcomes included increases in noise levels, difficulty finding parking, higher housing and rent costs, increases in evictions, decreases in public safety, and a loss of neighborhood character. The Project Team aggregated responses indicating negative experiences into a single chart.

Renters in the survey were overall more concerned about negative impacts of CSTRs than homeowners. In the aggregate review described above, 67.33% of renters said they were "very concerned" about these negative impacts while only 45.09% of homeowners were "very concerned." Further, significantly more homeowners described themselves as "not concerned" (26.93%) about CSTR-caused negative impacts when compared to renters (9.11%).

While both homeowners and renters described themselves as "very concerned" more often than any other level of concern, renters showed significantly higher levels of concern than homeowners.

FIGURE 3. AGGREGATED CONCERN OVER NEGATIVE IMPACTS OF TRANSIENT LODGING USES, BY RENTER/OWNER

Question: "If you have experienced any of the following negative impacts of Commercial Short Term Rentals, how concerned are you about these impacts?"



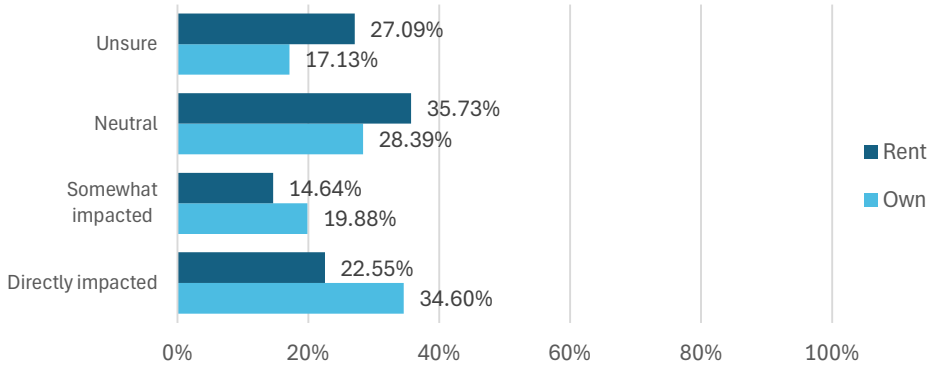
Experience with Positive Impacts

The survey also included a question on whether the respondent had experienced positive impacts from transient lodging uses and to describe the nature of those experiences. These positive impacts included increases in tourism or visitors, local spending, property improvements and renovations, property values, and public safety. These responses were aggregated into a single chart to illustrate the overall positive experience with CSTRs from both the owner and renter perspective.

Based on **Figure 4**, homeowners were more likely than renters to report being "directly impacted" by the positive effects of CSTRs (34.60%) compared to renters (22.55%). Renters, however, were more likely to describe themselves as "neutral" (35.73%) or "unsure" (27.09%) about positive impacts when compared to homeowners (28.39% neutral and 17.13% unsure). Overall, this suggests homeowners perceive or experience more direct benefits from CSTRs than renters do, while renters remain less certain or neutral about such impacts.

FIGURE 4. AGGREGATED POSITIVE IMPACT EXPERIENCED FROM TRANSIENT LODGING USES, BY RENTER/OWNER

Question: "If you have experienced any of the following positive impacts of Commercial Short Term Rentals, select the level of impact you have experienced."



When asked about what the city should prioritize when comprehensively updating transient lodging regulations, a number of differences and a few similarities emerged between renters and homeowners. Renters show much stronger support for the City pursuing protective and restrictive measures. A significantly higher percentage of renters, compared to homeowners, believe the City should prioritize preserving housing for year-round residents (86.24% of renters vs. 52.62% of owners), stopping illegal CSTRs (83.33% vs. 68.45%), keeping neighborhoods residential (78.04% vs. 51.14%), and limiting the development of future CSTRs (74.60% vs. 50.11%). Renters are also more likely to favor phasing out grandfathered CSTRs that are no longer permitted (67.99% vs. 44.31%). These trends suggest that renters feel more acutely threatened by the proliferation of CSTRs. This is in keeping with previously discussed findings that renters showed higher levels of concern regarding the negative impacts of CSTRs in their neighborhoods.

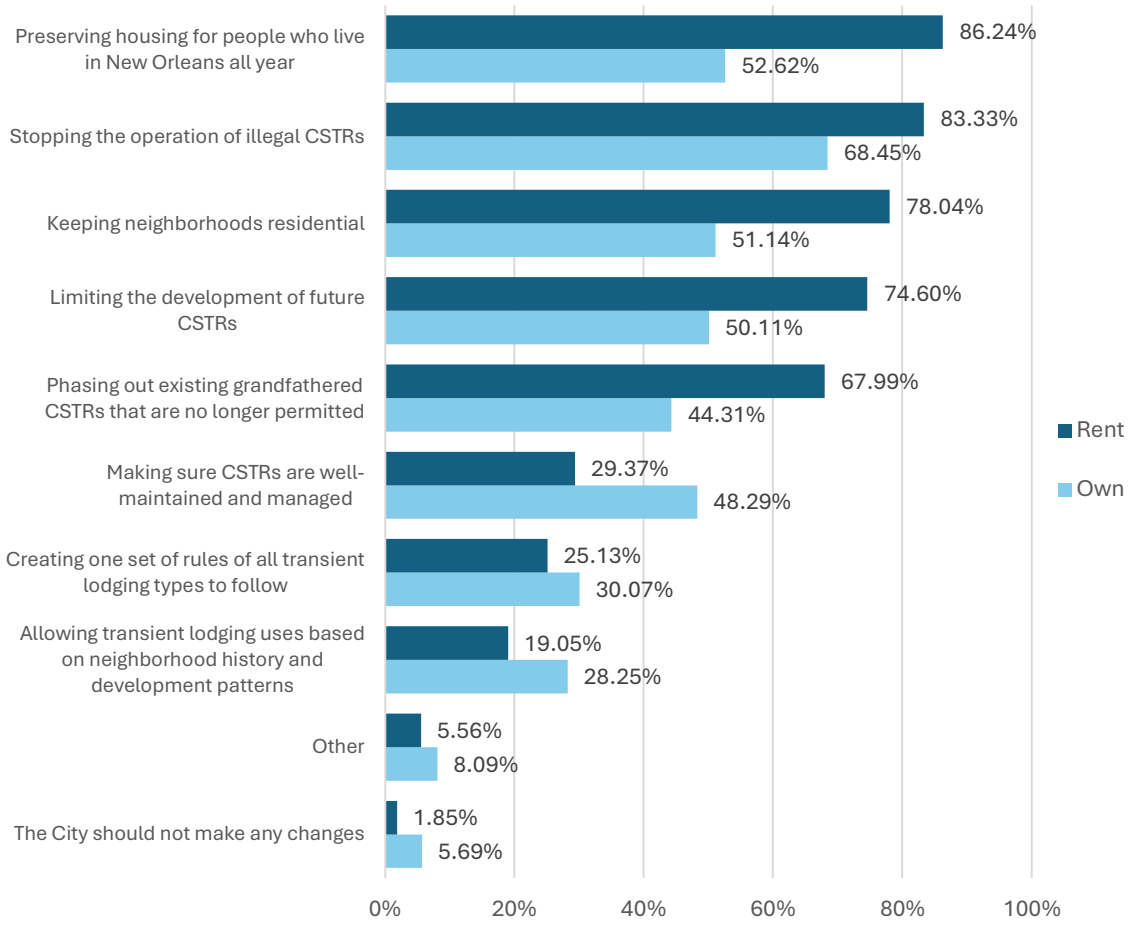
Homeowners, on the other hand, were shown to prioritize an emphasis on proper management and regulatory flexibility. Owners are more likely than renters to support measures such as making sure CSTRs are well-maintained and managed (48.29% of owners vs. 29.37% of renters) and allowing transient lodging uses based on neighborhood history and development patterns (28.25% vs. 19.05%). Owners also show a slight preference for creating a single set of rules for all transient lodging types (30.07% vs. 25.13%). These differences suggest that homeowners are more concerned with addressing issues via quality and oversight of CSTRs rather than their outright limitation and may also see some benefit in regulatory nuance depending on the neighborhood context.

Both groups, however, generally reject the idea of making no changes to existing regulations. Only a small fraction of either renters (1.85%) or owners (5.69%) believe the city should keep the status quo,

indicating a broad consensus that reform is necessary—though they diverge on what those reforms should look like.

FIGURE 5. RECOMMENDED FOCUS FOR CSTR REGULATORY IMPROVEMENT, BY RENTER/OWNER

Question: "The City is currently working to improve the rules for Commercial Short Term Rentals. What should they focus on?"



3.5 CSTR Owner and Non-Owner Cohorts

The topic of regulations and enforcement also revealed a pronounced divide in perspectives between two other cohorts within the survey: respondents who currently or previously owned a Commercial Short-Term Rental (CSTR) and those who did not. While the broader group shared concerns about enforcement and neighborhood impacts, CSTR owners consistently expressed a more favorable view of the role CSTRs play in the city's housing market and local economy.

When asked about CSTRs and existing housing stock, 77.27% of current or former CSTR owners stated that CSTRs help promote reinvestment in the housing stock, compared to only 20.80% of non-owners

who agreed with this assertion. A similar pattern emerged around economic opportunity: 63.64% of CSTR owners said CSTRs provide business opportunities for locals that would not otherwise exist through other types of transient lodging, while just 18.07% of non-CSTR owners and renters agreed. Additionally, 70.45% of current or former CSTR owners stated that CSTRs help support and grow local businesses, compared to only 17.48% of non-owners.

These findings suggest that lived experience as a CSTR operator significantly influences opinions on the benefits and drawbacks of short-term rentals. While non-owners are more likely to emphasize lived or perceived negative neighborhood impacts, CSTR owners tend to focus on lived or perceived economic and housing benefits.

FIGURE 6. CSTR IMPACT ON HOUSING MARKET, BY CSTR OWNERS/NON-OWNERS

Question: What statement below best captures your general opinion of commercial short-term rentals and their impact on New Orleans?

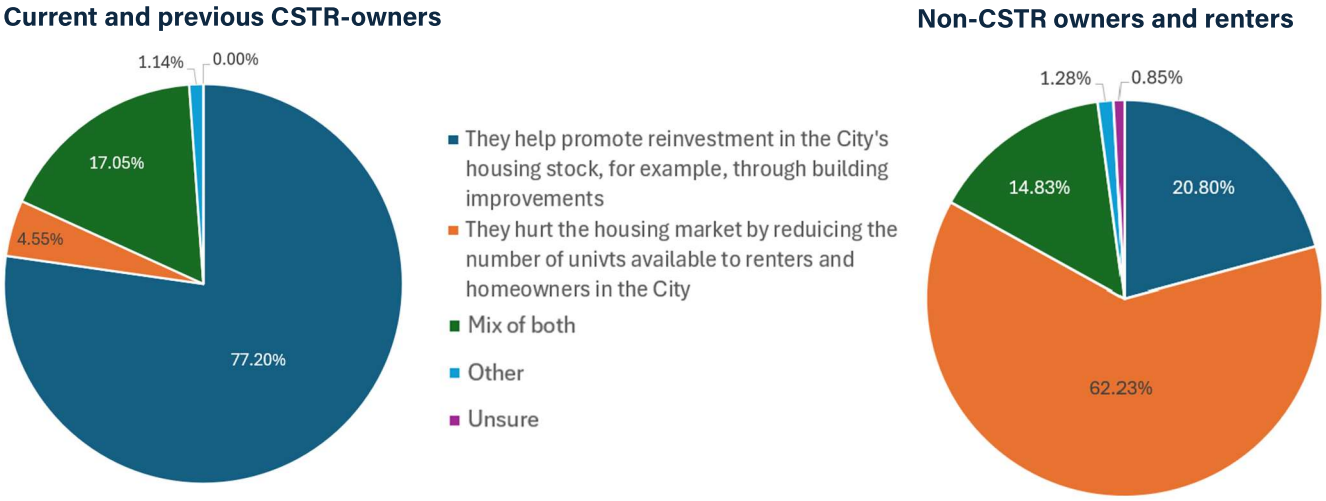
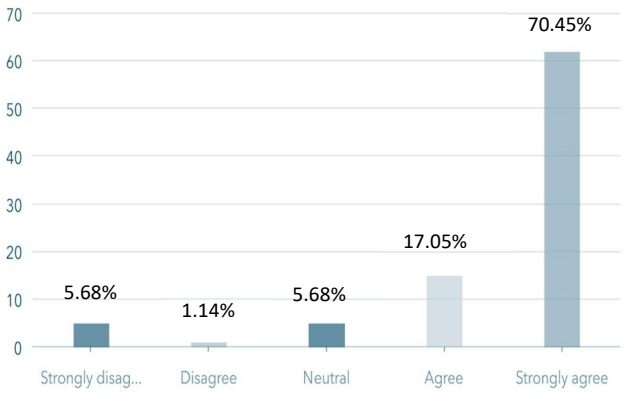


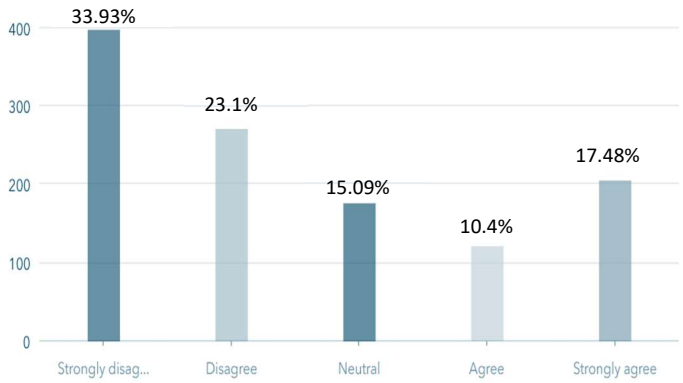
FIGURE 7. RESPONDENT SENTIMENTS OF CSTR IMPACT ON LOCAL BUSINESS, BY CSTR OWNERS/NON-OWNERS

Question: Select whether you agree or disagree: "Transient lodging uses, including Commercial Short Term Rentals, help support and grow local business in the area where I live."

Current and previous CSTR-owners



Non-CSTR owners and renters



These values were reiterated in the survey free responses, which included criticism of the City for "over-regulating" CSTRs and failing to protect the rights of property owners. The survey free response narratives reflect a strong concern among residents and property owners about the City's approach to regulating business, particularly STRs. One respondent, a lifetime resident, expressed frustration with what they describe as "the City's ongoing efforts to quench business development," arguing that "businesses across the economic landscape see little reason to invest" because of "excessive regulations under the guise of affordable housing, slumlords, and so on."

A central theme across these statements is the defense of compliant CSTR operators. "Don't punish the CSTR operators who follow the rules," one respondent stated, urging the City to "shut down the illegal operators and properties" instead. These legal operators, they argue, "are not the bad guys here" but rather contribute significantly to the local economy "through property taxes AND [sic] occupancy taxes." Their goal, they say, is not disruption, but to "share the city with all our visitors."

Several respondents pushed back on the narrative that CSTRs displace residents. One respondent who provided additional comments shared their view that "most CSTRs don't displace," and that the properties were often "in poor condition or rented to a prior business that didn't keep up the property." They advocate for maintaining the "right of the owner to use as they see fit within the current laws" and highlight the entrepreneurial work of CSTR owners.

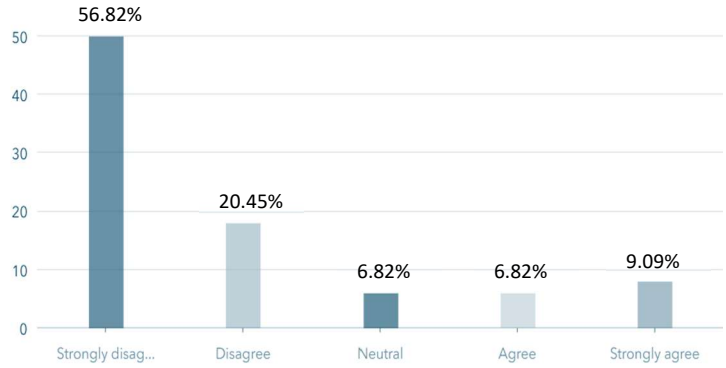
Many respondents expressed their belief that when properly managed, CSTRs are seen as a force for good — "bringing tourist dollars into neighborhoods, where there is blight and crime," which in turn "improve[s] these neighborhoods" and "provid[es] jobs for those living in their proximity." Another commenter suggests that many of the common concerns — "noise, parties, parking"— could be resolved if the City simply "enforced penalties on illegal STRs to make them unviable."

The survey data below concerning regulations continues to reflect this division both in the focus of regulations and the nature of their enforcement.

FIGURE 8. REGULATING CSTRS SIMIARLY TO HOTELS AND MOTELS, BY CSTR OWNERS/NON-OWNERS

Question: Select whether you agree or disagree: "Commercial Short-Term Rentals should be regulated more consistently with Hotels and Motels. (i.e. requiring staff to be on-site full time, passing building inspections, and following fire safety code)."

Current and previous CSTR-owners



Non-CSTR owners and renters

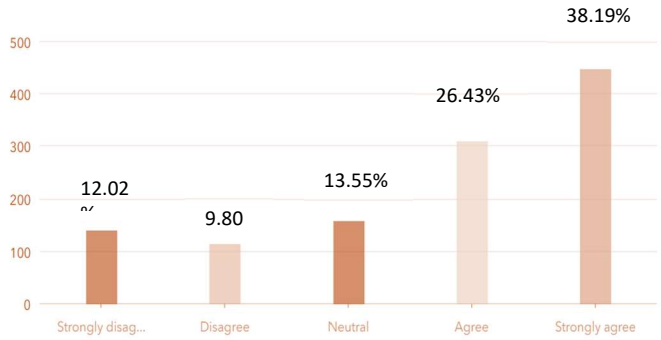
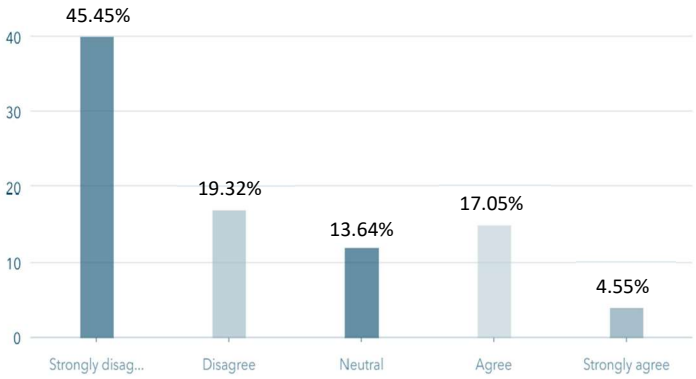


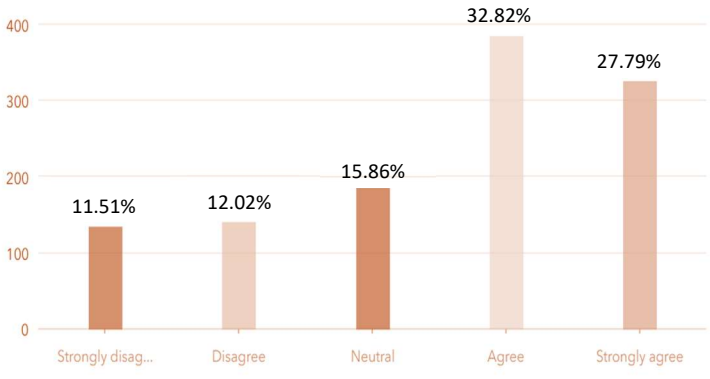
FIGURE 9. REGULATING CSTRS SIMILARLY TO BED AND BREAKFASTS, BY CSTR OWNERS/NON-OWNERS

Question: Select whether you agree or disagree: "Commercial Short Term Rentals should be regulated more consistently with Bed and Breakfasts (i.e. permitted as a conditional use under limited circumstances with community input.)"

Current and previous CSTR-owners



Non-CSTR owners and renters



3.6 Impacts of STRs

The impacts of Short Term Rentals (STRs) in New Orleans emerged in the survey data through four major themes: housing affordability and displacement, neighborhood quality of life, enforcement and regulation, and economic opportunity. These themes reflect the diverse and often conflicting experiences residents have had with STRs across different parts of the City.

Concerns about housing affordability and displacement were among the most prominent. Residents described how STRs have reduced the availability of long-term rental units, driven up housing costs, and contributed to the loss of permanent neighbors in areas like the Marigny, Treme, and French Quarter. Many shared personal stories of being priced out of their neighborhoods or witnessing longtime residents leave due to the pressures of rising rents and speculative real estate investment.

The second theme, neighborhood quality of life, focused on the transformation of residential areas into tourist zones. Residents reported issues such as noise, overcrowding, a decline in public safety, and a loss of the familiar character that once defined their communities. STRs were frequently associated with absentee ownership and guests who do not respect local norms, leaving neighborhoods feeling hollowed out or unstable.

Third, the theme concerning STR density arose in the narrative responses. Respondents expressed strong worries about the high density of CSTRs in certain neighborhoods, particularly in areas like the Bywater that have non-residential zoning districts inside the neighborhood itself. Many called for strict limits on the number of CSTRs allowed, especially within multi-unit buildings.

Enforcement and regulation surfaced as a particularly divisive issue. While many residents supported the idea of STRs in principle, they expressed frustration over what they perceived as the City's failure to enforce existing rules. Comments often pointed to the proliferation of illegal STRs and a lack of meaningful consequences for violations. Calls for a better-staffed enforcement team, more transparency, and a stable regulatory framework were widespread.

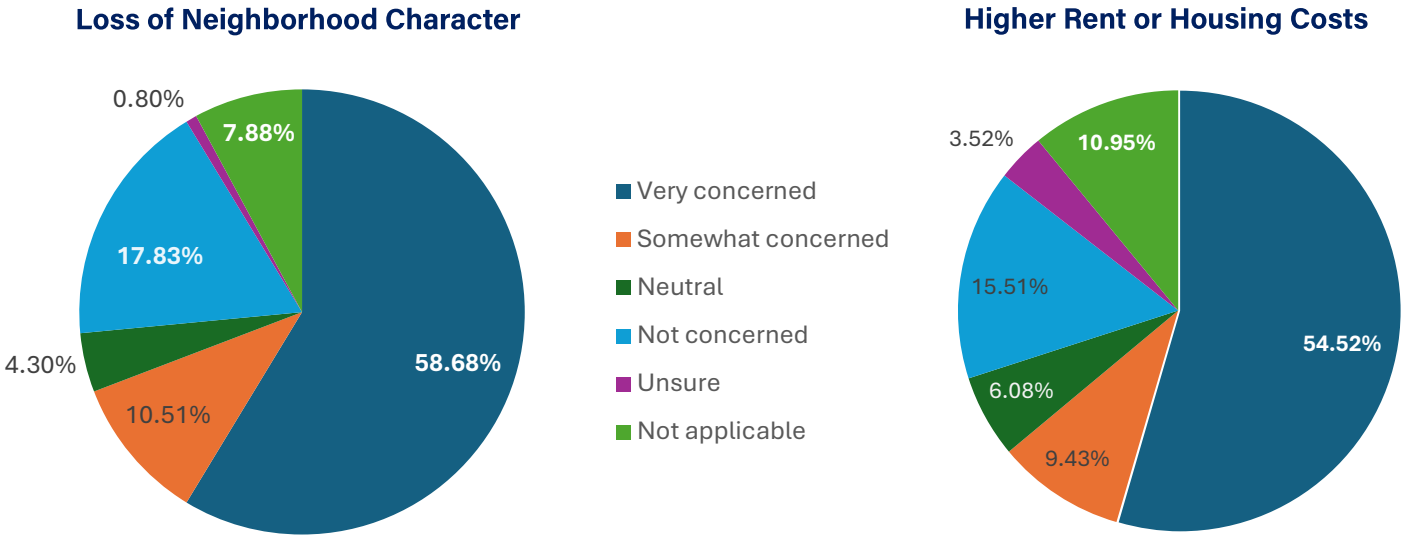
Together, these four themes illustrate the complexity of public sentiment around STRs. While STRs have brought real economic benefits to some, they have also contributed to broader challenges facing New Orleans, particularly in maintaining affordable, livable neighborhoods that provide a high quality of life for permanent residents.

Theme 1: Quality of Life / Preservation of Neighborhood Character

Respondents expressed concern regarding numerous negative impacts to their quality of life due to STRs, with "increased housing/rent costs," (54.52%), "loss of neighborhood character" (58.68%), and "more vacant or investor-owner properties" (60.00%) being the primary concerns for the majority.

FIGURE 10. CONCERN FOR NEGATIVE IMPACTS OF TRANSIENT LODGING USES (SELECTED)

Question: If you have experienced any of the following negative impacts of Commercial Short-Term Rentals, how concerned are you about these impacts?

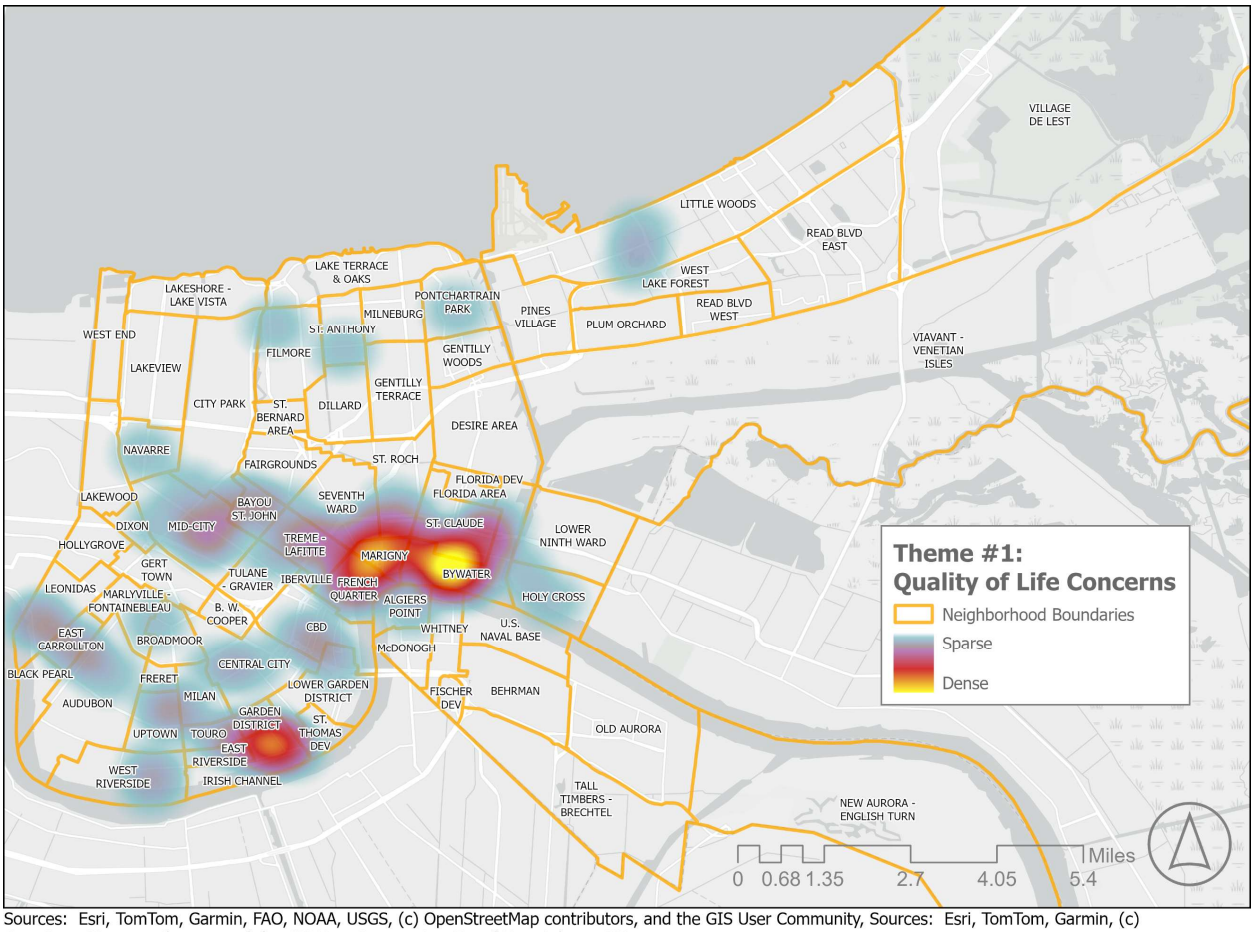


Quality of life issues were also a predominant theme in the community survey free response section, reflected in 95 out of the 514 comments. These concerns were most elevated in the Bywater, Marigny, and Garden District neighborhoods.

Respondents described short-term rentals (STRs) as deeply disruptive to their quality of life and harmful to both their neighborhoods and the broader fabric of the city. Common complaints included increased noise, garbage, traffic, and crime—issues often associated with what several respondents called a pervasive "party culture." This culture was said to erode the sense of community and stability in residential areas, contributing to insufficient parking, a lack of permanent neighbors, and an overall decline in feelings of safety and community connection.

One respondent stated, "I have found the commercial STRs in my area to bring nothing but trouble." They cited repeated disturbances, saying STRs "bring groups of tourists who are loud, party, leave trash around, take up parking, and generally don't care for my neighborhood because they don't live here." Another respondent reflected on the shift in neighborhood dynamics, explaining, "Because fewer people actually live here, no one sits on their porch anymore. People don't know each other and it is much, much less safe. Community has been broken." These testimonies illustrate a shared concern that STRs replace long-term residents with transient visitors, weakening the social bonds that once defined their communities.

FIGURE 11. QUALITY OF LIFE THEME IN COMMUNITY SURVEY FREE RESPONSES BY NEIGHBORHOOD



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community, City of New Orleans GIS,
Map Prepared by Desire Line LLC

Others framed STRs as a broader threat to the City's affordability and livability. One respondent wrote, "STRs are a real problem in our city," explaining that they decrease available housing, take the character out of neighborhoods, make housing unaffordable for local residents, increase noise pollution, and bring more rideshare traffic into areas that would otherwise see little of it. The respondent concluded that STRs "generally degrade our city in every way." These views underscored a belief that STRs were not just a nuisance, but a force accelerating displacement, diminishing neighborhood identity, and undermining the long-term sustainability of New Orleans' communities.

Comparatively, the majority of survey respondents did not report being directly impacted by any positive impacts of STRs (77.46% of renters, and 65.4% of owners).

Some survey respondents emphasized the positive impacts of STRs and CSTRs on New Orleans' economy, neighborhoods, and tourism sector. Many viewed STRs as vital contributors to the City's financial health, citing their role in sustaining restaurants, bars, shops, and other small businesses through increased tourism activity. One respondent wrote, "The City needs STRs to support tourism in the city," explaining that there were not enough lodging options for visiting families and urging the City to "regulate and inspect these properties" rather than restrict them.

Several respondents focused on how STRs helped revitalize neighborhoods and build stronger community ties. One respondent stated, "CSTRs strengthen New Orleans' tourism economy by bringing visitors to neighborhoods where we live." They added that guests "live like locals—supporting communities," and emphasized that STRs help "families stay near loved ones," maintain neighborhood upkeep, and "spread tourism dollars more evenly." These comments reflected a belief that STRs served both residents and visitors by fostering connection and economic opportunity in areas that might otherwise be overlooked.

Other respondents pointed to the potential for STRs to address larger systemic challenges, such as vacancy and disinvestment. One noted that "housing prices in New Orleans have been dropping" and that "there remains 18,000 blighted properties in New Orleans," and the solution is to "legalize all STRs." These comments suggested that, rather than contributing to housing shortages, STRs could play a role in neighborhood stabilization and the rehabilitation of neglected properties.

Another respondent directly linked STRs to public benefit, writing, "Properly licensed CSTRs and STRs are vitally important to the growth of tourism in New Orleans and generate much-needed revenue to the affordable housing fund." This highlighted a perspective that STRs, when lawfully operated, do not detract from affordability but instead help fund it—further positioning STRs as part of a broader solution to the city's economic and housing challenges.

Theme 2: Displacement Due To Unaffordability

Many respondents expressed concern about the rising cost of housing, noting that increases in property values and rent were not necessarily viewed as positive developments. The majority of both homeowners and renters, 69.84%, acknowledged that their property value or rent had increased, but this was rarely seen as a good thing. One respondent explained, "Although my property value has gone up, I do not see this as a net positive. My home WAS [sic] appropriately valued, but my neighborhood is now unaffordable for my peers." This reflected a broader anxiety that STRs are contributing to housing instability and making it harder for residents to remain in their communities.

FIGURE 12. RENT INCREASES

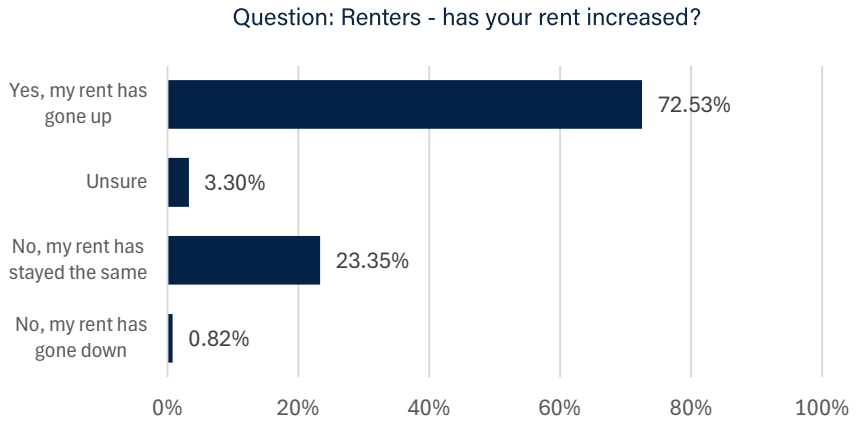
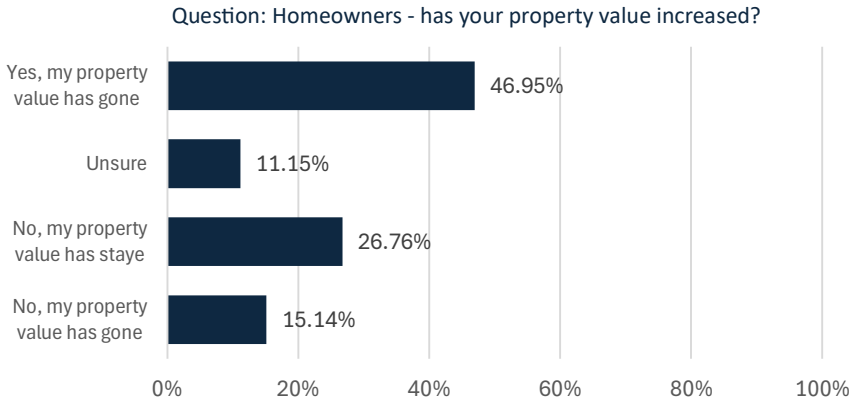


FIGURE 13. PROPERTY VALUE INCREASES



Displacement was a particularly urgent concern. Over a quarter of respondents, 344 individuals or 27.28%, reported that they or someone they knew had been evicted from a unit that is now being used as a CSTR. These incidents have reportedly become more frequent in recent years. In community survey free response comments, 85 out of 514 respondents raised issues related to the displacement of locals, the loss of affordable housing, and the weakening of neighborhood identity and cohesion. While the Bywater, Marigny, and Garden District[3] remained among the neighborhoods with the highest density of concerns regarding "displacement due to unaffordability," notably, the neighborhoods of Bayou St. John and Mid-City had greater representation in the responses as well.

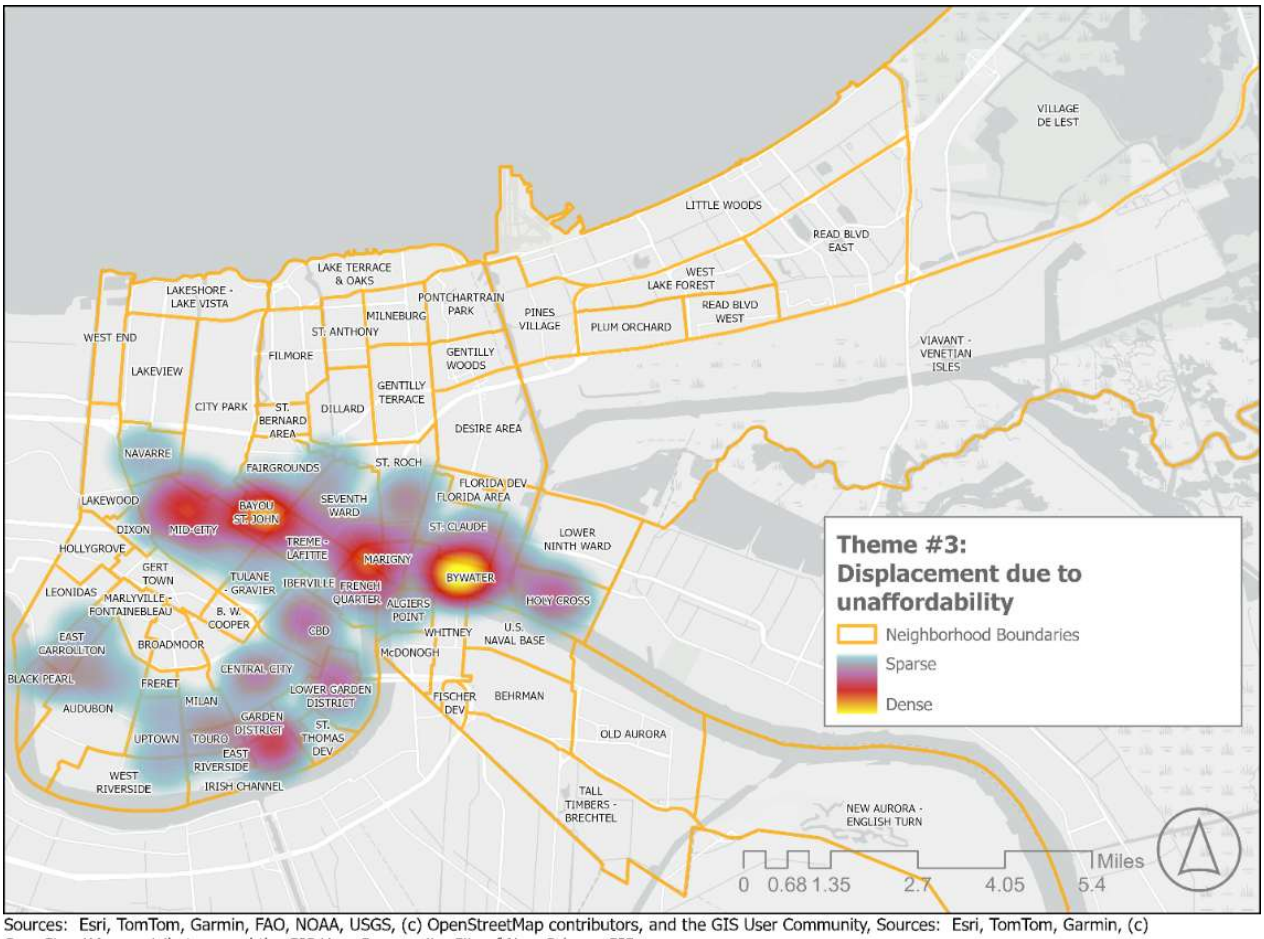
Several respondents highlighted the impacts of STRs in historically significant neighborhoods. One warned, "The French Quarter is under threat as it has lost many of its long-term residents due to the problems created by unsustainable tourist load. It is first and foremost a living, breathing neighborhood dependent on the people who live here to protect it from commercialization." Another noted, "Treme is half a block from our home in the French Quarter. We have seen it hollowed out by STR's since Katrina. I have seen the number of permanent residents in the quarter go from 10,000 in 1978 when I moved in to maybe 3,000 today because of the tourism pressure." Additional comments described a shrinking rental market and soaring rents pushing people further away from their "home" neighborhoods, jobs, and cultural centers, "all in exchange for people who should be in hotels."

"The Marigny and Treme are basically ruined by STRs. There's not much culture when no one can afford to live here."

Other respondents expressed frustration with the social and cultural effects of STRs. One individual stated, "CSTRs have gutted neighborhoods by pushing out full-time residents and leaving huge portions of residential communities vacillating between being ghost towns, attractive to criminals, and party-central full of people who treat the community as a single-use experience with no regard for their impact." Another bluntly assessed, "The Marigny and Treme are basically ruined by STRs. There's not much culture when no one can afford to live here." These statements highlight a widespread perception that STRs contribute not only to housing affordability problems but also to the erosion of the community fabric and cultural identity in New Orleans neighborhoods.

[3] Note: The Garden District does not permit STRs.

FIGURE 14. DISPLACEMENT DUE TO UNAFFORDABILITY THEME IN COMMUNITY SURVEY FREE RESPONSES BY NEIGHBORHOOD



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community, City of New Orleans GIS,
Map Prepared by Desire Line LLC

Theme 3: Density of STRs in the Community

Respondents consistently raised concerns about the density of STRs in their neighborhoods. Although the survey did not specifically address density, it became a frequent topic in free response comments. Many emphasized the negative impact that clusters of STRs have on neighborhood stability and community character.

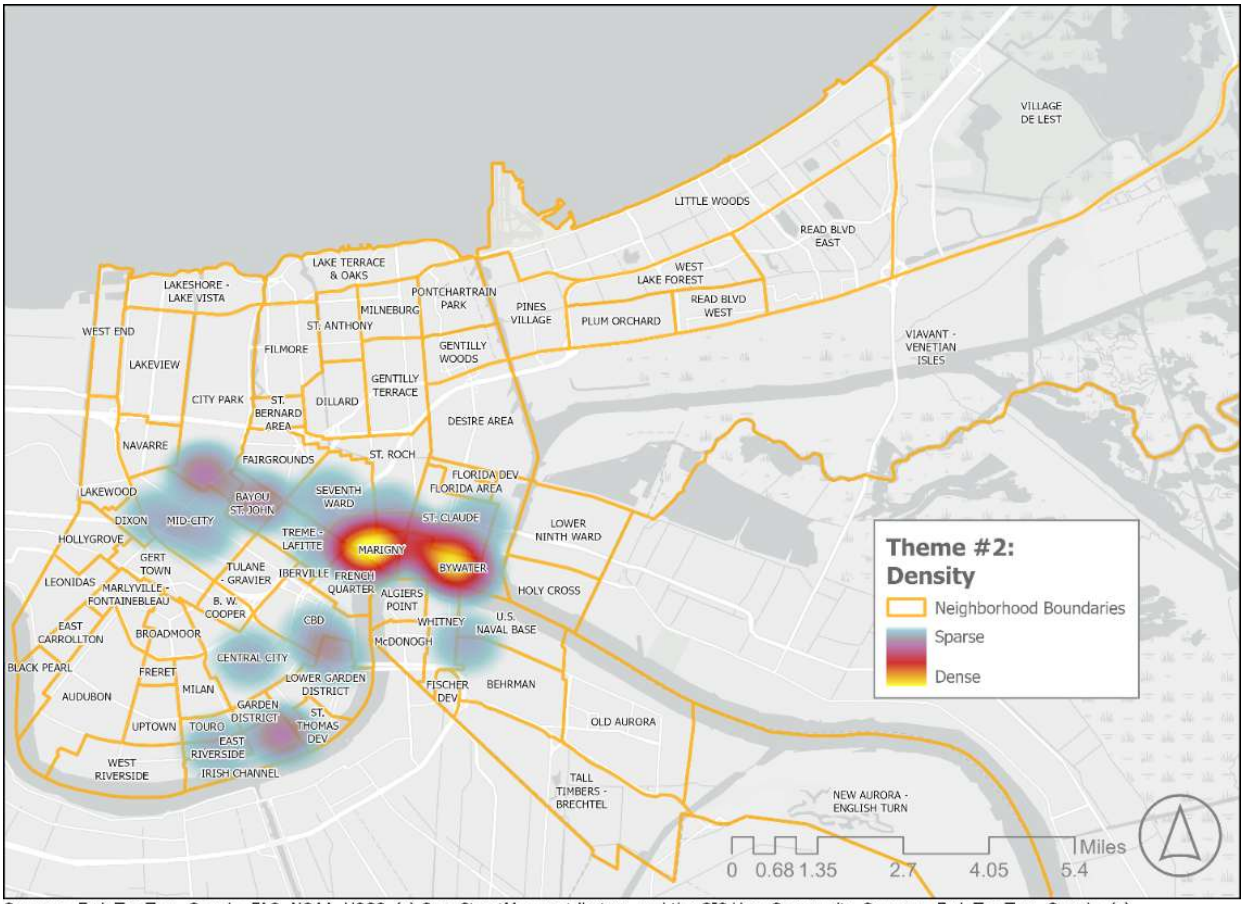
Many respondents recommended placing clear limits on STR density, proposing caps based on zoning districts, neighborhoods, or even individual blocks. One respondent described a situation in the Bywater neighborhood, saying, "There are entire whole blocks in the Bywater that are Commercial Short Term Rentals. They appear to look residential but are zoned commercial so can operate like mini hotels. It's disgusting." This perception of residential neighborhoods being hollowed out by CSTRs and converted into "de facto hotel districts" was a recurring theme in the feedback.

Others specifically suggested restricting the number of CSTRs permitted within multi-unit buildings to prevent excessive concentration. One respondent strongly argued that "the number of CSTRs should be severely limited just as the number of NSTRs have been," particularly emphasizing that multi-unit buildings should have stricter controls. Another respondent echoed this recommendation, advocating

for "strict density caps in mixed use neighborhoods." Overall, both respondent comments and geographic data reflect a clear and consistent desire among residents for targeted density controls to preserve neighborhood integrity and community stability.

The heat map in **Figure 16** shows density-related comments are especially concentrated in the Marigny and Bywater neighborhoods. Density-related comments are also moderately concentrated in the Mid-City, Bayou St. John, and portions of the Lower Garden District and Irish Channel neighborhoods. These hot spots correlate with areas that have high numbers of STRs, according to City sources. The Marigny (441 units), Bywater (235 units), Mid-City (587 units), Lower Garden District (412 units), and Bayou St. John (164 units) are all in the upper quintile for having the most STR units according to the City's Granicus dashboard. While the Irish Channel is not in the upper quintile for total number of STR units, it is in the upper quintile for community surveys completed, with the seventh most of any neighborhood, at 40 surveys completed. A high number of surveys completed suggests residents there may be highly motivated by quality of life concerns related to STRs.

FIGURE 15. DENSITY THEME IN COMMUNITY SURVEY FREE RESPONSES BY NEIGHBORHOOD

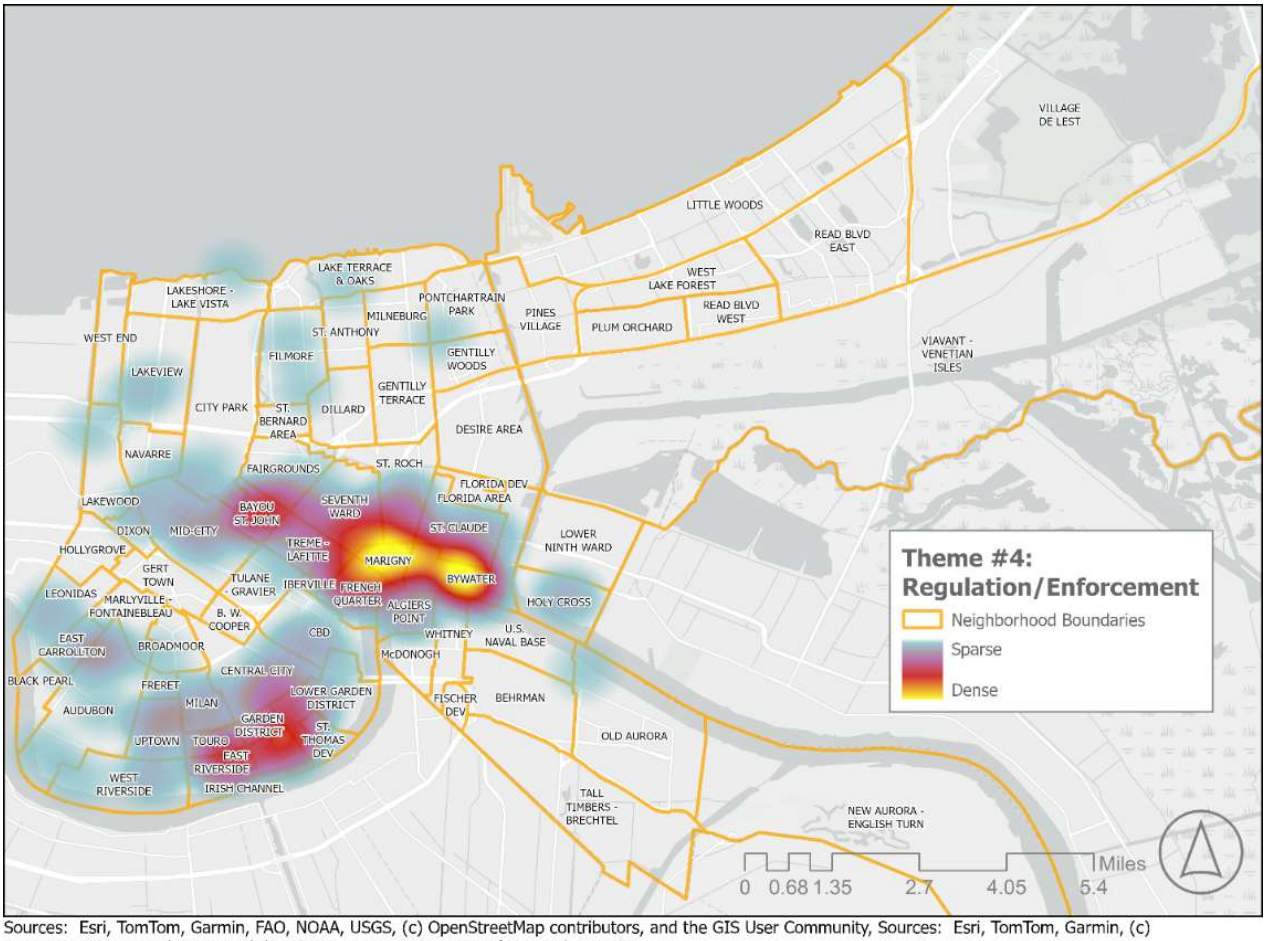


Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community, City of New Orleans GIS,
Map Prepared by Desire Line LLC

Theme 4 – Regulation and Enforcement

The most prevalent theme among respondents' community survey free responses, appearing in 212 out of 514 comments, related to regulations and enforcement of Short Term Rentals (STRs). While the survey data provided some insight into public opinion about the focus of existing regulations, the highest priorities for many were stopping the operation of illegal STRs and preserving housing for year-round residents of New Orleans. Respondents spoke more frequently about enforcement of regulations rather than the regulations themselves, with this concern particularly strong in the Marigny and Bywater neighborhoods, though it was also echoed in the Garden District and Irish Channel. One respondent urged, "Please stop the destruction of our neighborhoods," blaming the "complete lack of enforcement of STR rules and regulations" for allowing illegal STRs to proliferate in all neighborhoods. Others emphasized the need for a dedicated and well-staffed enforcement team, suggesting that "a significant fee should be added to all Short Term Rentals to pay for the Enforcement team."

FIGURE 16. REGULATIONS AND ENFORCEMENT THEME IN COMMUNITY SURVEY FREE RESPONSES BY NEIGHBORHOOD



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Sources: Esri, TomTom, Garmin, (c) OpenStreetMap contributors, and the GIS User Community, City of New Orleans GIS,
Map Prepared by Desire Line LLC

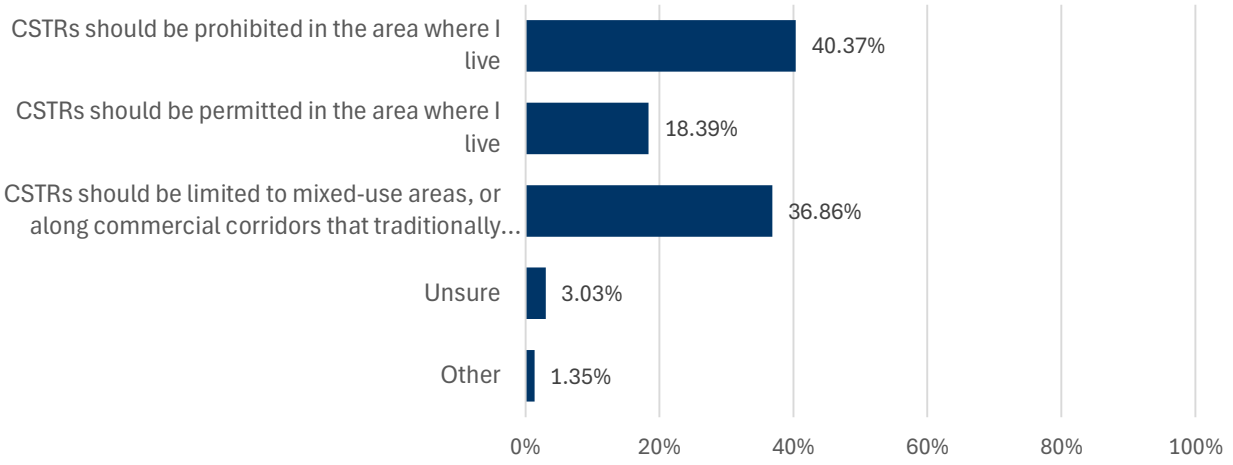
Respondents expressed a desire for consistent enforcement over time to create a reliable standard. One comment recommended enforcing current STR rules on illegal STRs for two to three years before assessing their impact: "Shutting down unpermitted STRs will allow us to accurately determine the

effects on our city. Once we have this information we can use this to determine effects and next steps." Another respondent highlighted the disparity between permitted and actual listings, stating that "In 2023, approximately 2,000 permits were active despite 7,500 active Airbnb listings. Illegal CSTRs abound and are what truly hurt neighborhoods." This respondent cautioned that banning CSTRs would only benefit hotel chains while penalizing the positive aspects of STRs, saying, "Without real enforcement, nothing else matters."

A strong desire for regulatory stability and predictability was evident, with many respondents frustrated by frequent changes to the City's STR policies. Comments included, "I wish the city would stop changing its stance on STR," and "The city needs to stop changing the regulations for short term rentals. [It affects] home owners and investors alike, and constant changes causes illegal operations to flourish." Several respondents voiced skepticism about the City's ability to properly manage STRs, stating that "the missteps the city has made along the way show that it is incapable of properly handling burgeoning technology and trends" and that "it doesn't matter what rules the city makes for governing STRs if they don't even enforce the ones currently on record." The perceived lack of resources and political will was summarized by one respondent: "Almost no one believes that the city has the resources and capabilities to run a properly regulated program nor the will to do so."

FIGURE 17. MEANS OF REGULATING CSTRS

Question: How do you think Commercial Short Term Rentals should be regulated in the area where you live?



The permitting process itself drew criticism, with calls for a more stringent application, interview, and inspection process that includes community input before permits are granted. One respondent shared frustration that "3 CSTR permits were granted [to] 1100 City Park Avenue without allowing neighbors a chance to voice opposition as we had been promised." Others noted unfair advantages created by certain zoning practices, with one respondent stating, "The rampant use of IZDs creates an unfair regulatory environment that unfairly favors opportunistic developers over long-term residents." Concerns about minimal consequences for illegal STRs were frequent. One respondent reported that an illegal operator in their neighborhood was simply fined and then granted a license, despite operating illegally for months.

Support for grandfathering existing permit holders was also expressed, with respondents noting, "There's little to nothing wrong with the current rules except for the uneven enforcement of those

rules. If dramatic changes to CSTR rules are made, existing permit holders should be grandfathered into the current rules to protect their investments and the local economy they support."

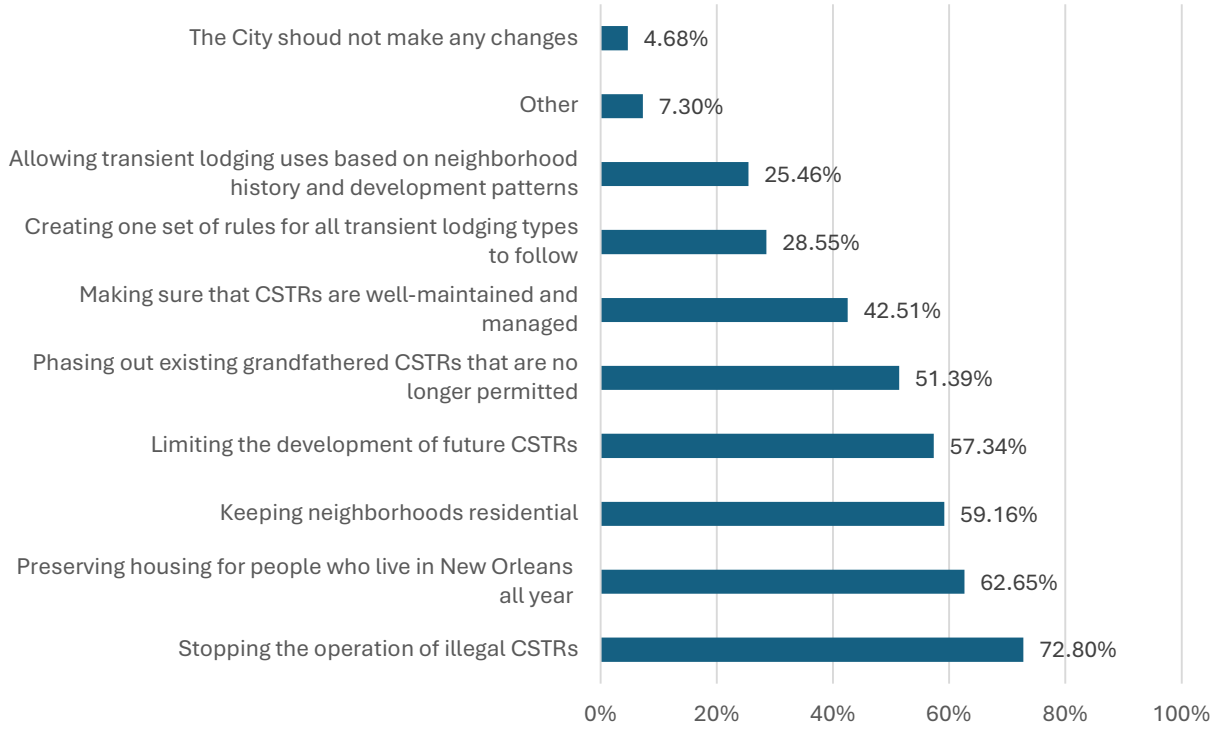
Many respondents recommended that regulations require local ownership and on-site management of STRs to improve accountability and reduce neighborhood disturbances. One respondent characterized CSTRs as "unregulated hotels run by out-of-state LLCs that don't give a damn about New Orleans," and called for on-site management or shutdowns. Others advocated that "Short term rentals, whether commercial or not, should only be allowed when there is an owner or resident manager living on the property," and that limits be placed on concentration and permit renewals. Several respondents emphasized that STR ownership should be limited to locals, warning against allowing out-of-town developers and corporations to dominate the market.

Survey data showed that most respondents believed both CSTRs and Bed and Breakfasts should be permitted in their neighborhoods, while hotels and motels should be limited to mixed-use areas or commercial corridors without significant long-term housing. Some suggested that permit allowances should be tailored to individual neighborhoods. For example, one respondent wrote, "CSTRs can be good but they should be in commercial corridors & not neighborhoods. For example, streets like Broad, St Claude, Carrollton, OC Haley, Tchoupitoulas. They should be allowed in the entire CBD to encourage development & could allow out of towners to buy condos & rent them out like in Florida."

Finally, respondents prioritized "stopping the operation of illegal CSTRs" and "preserving housing for permanent residents" as the most critical goals for improving STR regulations.

FIGURE 18. RECOMMENDED FOCUS FOR CSTR REGULATORY IMPROVEMENT

Question: The City is currently working to improve the rules for Commercial Short Terms. What should they focus on?



3.7 Neighborhood Typology Methodology

Appendix A includes several quantitative datasets analyzed as part of this Study. From both **Appendix A** and **Appendix B**, a three-tiered transient lodging land typology (higher, medium, and low) was developed to support the development of Study recommendations based on both qualitative and qualitative inputs. Recognizing that different parts of the city have different challenges associated with short term lodging, these categories assisted the Study team in considering the regulatory regime required to manage those challenges. Datasets available and analyzed to inform transient lodging land use typologies include (with their source[4]):

- CSTR Licenses Issued (Safety & Permits)
- NSTR Licenses Issued (Safety & Permits)
- 311 Complaints Received (311)
- Surveys Received (Desire Line)
- Survey Narrative Received (Desire Line)
- Total Short-Term Units (Granicus)
- STR Unit Compliance Ratio (Granicus)\

These datasets were grouped by neighborhood and sorted based on their impacts expressed in the data. The upper quintile of each dataset was identified and further analyzed to support Study recommendations, and three groupings were formed, defined as:

> **Higher Impact**: Areas with the most STR units and high neighborhood engagement on quality-of-life issues. Neighborhoods in this category are in the upper quintile (top 20%) for number of STR units (per Granicus dashboard) and the upper quintile (top 20%) for number of community survey responses, short-form narrative engagement on the community survey, or 311 complaints related to transient lodging uses.
>
> **Medium impact**: Areas with the most STR units or high neighborhood engagement on quality-of-life issues. Neighborhoods in this category are in the upper quintile (top 20%) for number of STR units (per Granicus dashboard) or are the upper quintile (top 20%) for number of community survey responses, short-form narrative engagement on the community survey, or 311 complaints related to transient lodging uses.
>
> **Lower Impact**: All remaining neighborhoods in the City.

[4] Note: The Safety & Permits, 311, and Granicus data used was the data available to the project team at the time of the outreach (February 2025).

TABLE 4. NEIGHBORHOOD TYPOLOGY

HIGHER IMPACT	MODERATE IMPACT	LOWER IMPACT	
Audubon	Algiers Point	B. W. Cooper	Lower Ninth Ward
Bayou St. John	City Park	Behrman	Marlyville – Fontainebleau
Broadmoor	East Riverside	Black Pearl	McDonogh
Bywater	French Quarter	Desire	Milneburg
Central Business District	Gentilly Terrace	Dillard	Navarre
Central City	Holy Cross	Dixon	New Aurora – English Turn
Irish Channel	Milan	East Carrollton	Old Aurora
Lower Garden District	St. Thomas Development	Fairgrounds	Pines Village
Marigny	Uptown	Filmore	Plum Orchard
Mid-City	West Riverside	Fischer Dev	Pontchartrain Park
Seventh Ward		Florida Area	Read Blvd East
St. Claude		Freret	Read Blvd West
St. Roch		Garden District	St. Anthony
Treme - Lafitte		Gentilly Woods	St. Bernard Area
Tulane - Gravier		Gert Town	Tall Timbers - Brechtel
		Hollygrove	Touro
		Iberville	U.S. Naval Base
		Lake Catherine	Viavant - Venetian Isles
		Lake Terrace & Oaks	Village De L'Est
		Lakeshore - Lake Vista	West End
		Lakeview	West Lake Forest
		Lakewood	Whitney
		Leonidas	
		Little Woods	

4. Interview Analysis

4.1 Generally

A total of 31 stakeholders participated in 21 separate stakeholder interviews. These stakeholders were identified by the City, Study participants, focus group participants, and by themselves through the project website contact form or in follow-up to group meetings or discussions. The interviewees included representatives from real estate, development, banking industries, housing advocates, economic development professionals, neighborhood associations, Short Term Rental owners and operators, and hotel industry professionals.

4.2 Interview Details

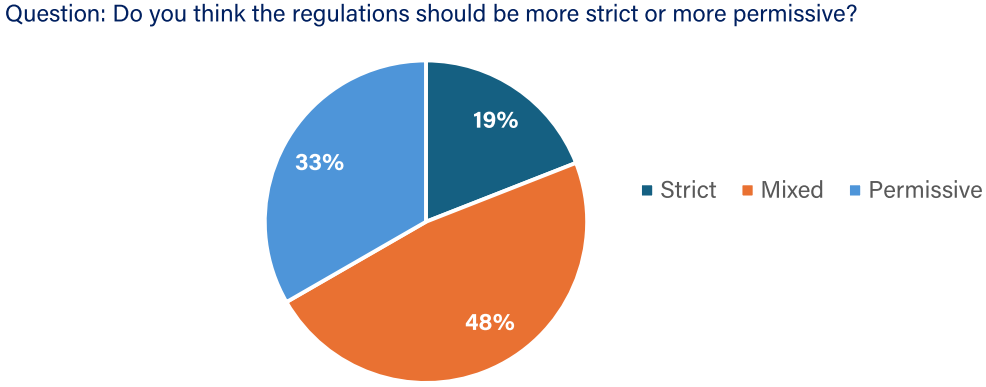
The interview questions were composed to help build consensus or isolate paths forward based on topics that emerged from the focus group meetings and the community survey. The questions discussed regulations, impacts, permitting limitations, neighborhood and zoning district differences, fees, hosting platforms, and use standards. First, interviewees were asked how familiar they were with

the current transient lodging use regulations in the City. A total of 9 (43%) interviewees stated they were very familiar, 8 (38%) were familiar, 3 (14%) were somewhat familiar, and 1 (5%) was not familiar.

When asked for their thoughts on transient lodging use regulations, interviewees had numerous answers, including the need for better enforcement and clarity, frustration about changing regulations, the need for a level playing field for all transient lodging uses, the need to close loopholes, and the contrasting needs to create more restrictions and remove restrictions from these uses. Interviewees stated positive impacts of transient lodging uses including development opportunities, economic development, smaller scale, authentic tourism experiences, job creation, and neighborhood revitalization. Interviewees also stated negative impacts, including mismanagement, nuisance issues, changes to historical uses, loss of neighborhood character and long-term residents, issues with enforcement, impacts on the housing market and affordability, and investment risks due to changing regulations.

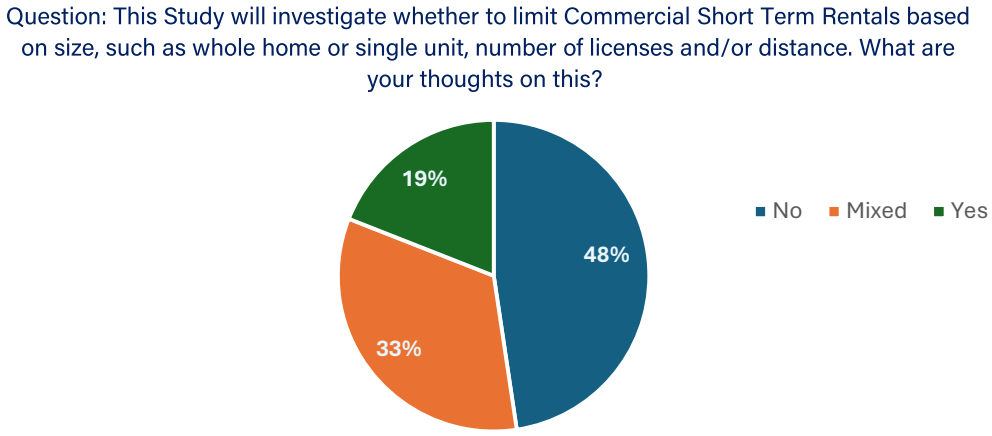
Interviewees were asked if regulations should be more strict or more permissive. Most of the participants had a mixed approach towards regulations (48%), while 33% thought they should be more permissive, and 19% thought they should be stricter. Those with a mixed perspective mentioned the need for enforcement, clear regulations, and predictability.

FIGURE 19



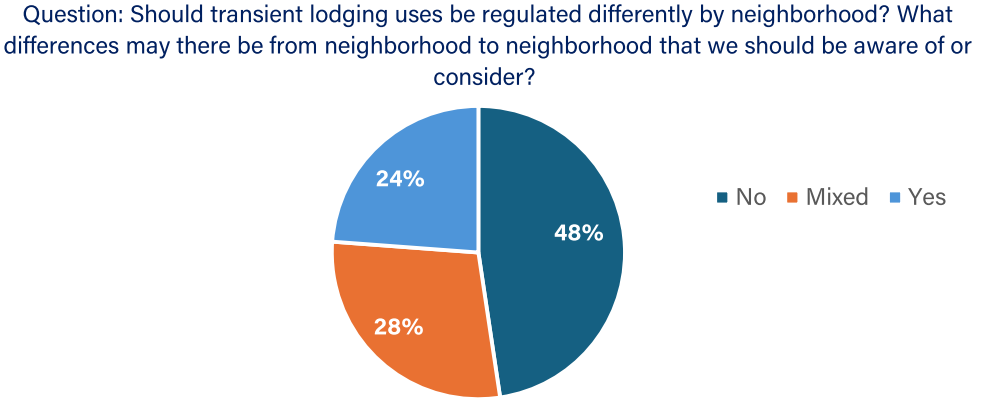
Interviewees had various thoughts on limiting CSTRs based on size, number of licenses, and/or distance. The majority thought that CSTRs should not be limited in this way (48%), while 33% had mixed opinions, and 19% thought that CSTRs should be regulated using those parameters. The mixed opinions included limits on density and licenses, not limiting whole homes, looking to zoning for use regulations, not devaluing the surrounding area, the need for onsite operators, and the use of simple rules, such as percentage of a block or area.

FIGURE 20



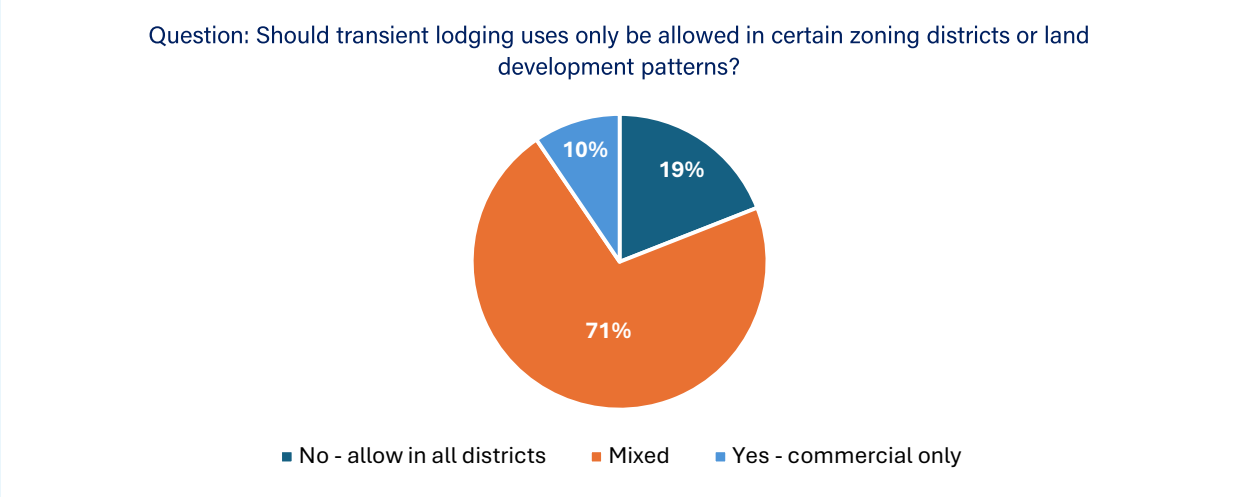
The stakeholders were asked about regulating transient lodging uses differently by neighborhood. A majority (48%) did not think there should be neighborhood differences in the regulations, while 28% had mixed opinions, and 24% thought there should be neighborhood differences. Many of those who said there should not be differences or had mixed opinions emphasized that the French Quarter and Garden District bans should not exist. The mixed responses underlined that transient lodging uses belong in the CBD or other commercial or mixed-use areas, perhaps with a percentage rule by neighborhood or zoning district, with limits in residential areas. One stakeholder mentioned that neighborhood by neighborhood differences are unfair unless all neighborhoods are engaged.

FIGURE 21



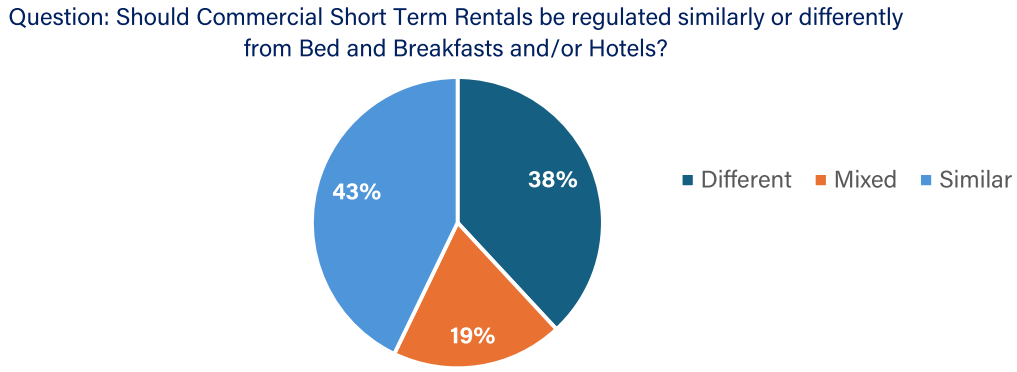
The interviewees discussed regulatory differences for transient lodging uses by zoning district. The majority (71%) had mixed responses to this question, while 19% thought there should not be differences, and 10% thought there should. Of those who had mixed responses, 7 thought they should be allowed in mixed-use and commercial districts, 3 thought they should be allowed where hotels are permitted, 2 thought they should be allowed in all districts with an examination of density, 2 thought they should be limited or not be in residential districts, and 1 thought neighborhoods should be examined for fit.

FIGURE 22



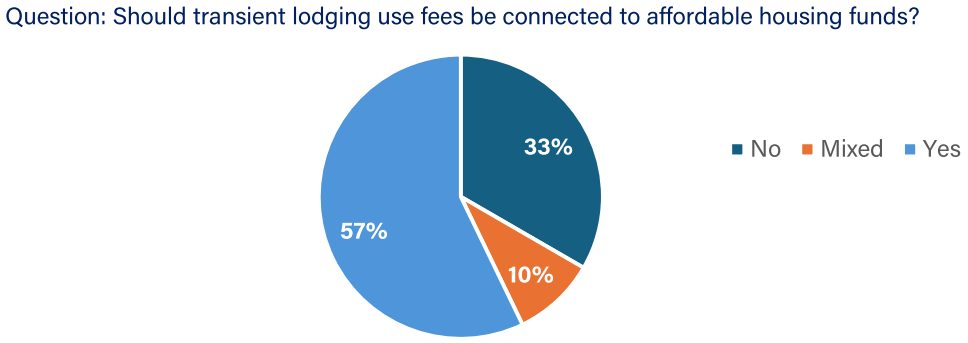
Interviewees discussed whether CSTRs should be regulated similarly or differently from Bed and Breakfasts and Hotels. A total of 9 (43%) said they should be regulated similarly, 8 (38%) said they should be regulated differently, and 4 (19%) had mixed opinions. Two interviewees noted that that CSTRs and hotels have different occupancy and scale, 1 stated there should be some similar regulations but the uses are different, and 1 emphasized that CSTRs should be treated as a commercial use.

FIGURE 23



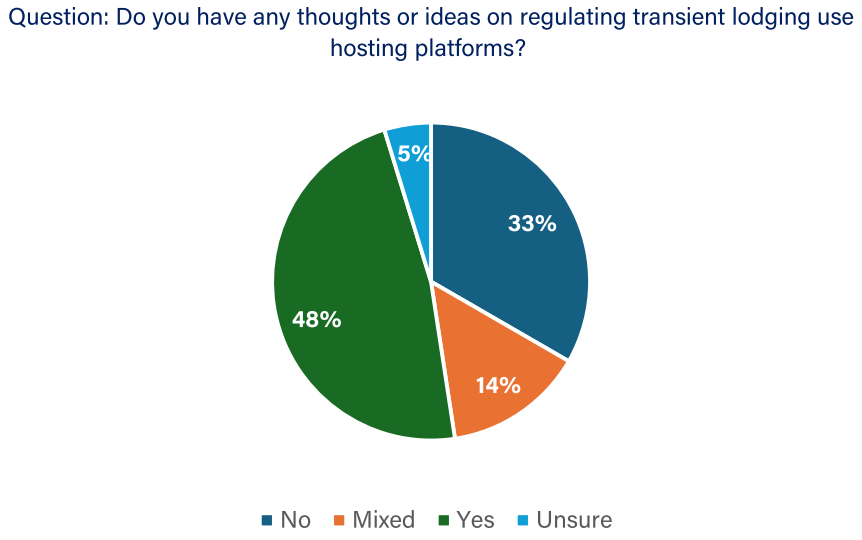
The interviewees were asked if transient lodging use fees should be connected to affordable housing funds. A total of 12 (57%) said yes, 7 (33%) said no, and 2 (10%) had mixed responses. Those with mixed responses pointed out that they do not think STRs are related to the affordable housing problem, but transient lodging uses in general could help contribute to the fund.

FIGURE 24



The interviewees further discussed regulation of transient lodging use platforms. A total of 10 (48%) thought they should be regulated, 7 (33%) thought they should not be regulated, 3 (33%) had mixed responses, and 1 (5%) was unsure. Those with mixed responses pointed out that the City should partner with the hosting platforms and work with them to support collecting and paying taxes.

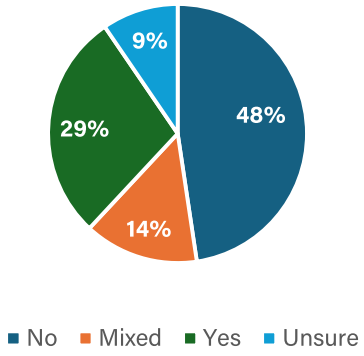
FIGURE 25



Interviewees were asked about specific use standards that could be incorporated into the Comprehensive Zoning Ordinance for transient lodging uses. A total of 10 (48%) thought there shouldn't be additional use standards, 6 (29%) thought there should be additional standards, 3 (14%) had mixed responses, and 2 (9%) were unsure. Those that thought there should be additional standards thought transient lodging uses should have similar standards, such as onsite operators, security, and safety standards. Those with mixed responses pointed out that hotels already have to meet building code but that other safety standards could be appropriate for uniformity across uses.

FIGURE 26

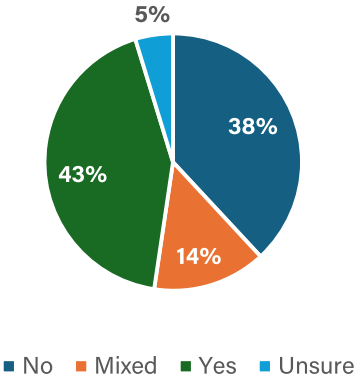
Question: Are there specific use standards that you think should be incorporated into the Comprehensive Zoning Ordinance for transient lodging uses?



Finally, interviewees were asked if there are additional safety and nuisance regulations the City could enact. A total of 9 (43%) said yes, 8 (38%) said no, 3 (14%) had mixed opinions, and 1 (5%) was unsure. Those that thought there should be additional regulations listed noise monitoring, transparency and communication about enforcement, trash and parking regulations, differences by neighborhood, video cameras to control noise and occupancy, and the need to revoke licenses from bad operators. The mixed respondents asserted that the current regulations are good, but more enforcement is needed.

FIGURE 27

Question: Do you think there are additional safety or nuisance related regulations that the City could enact related to transient lodging uses?



In summary, interviewees were largely very familiar or familiar with the regulations, giving them a unique insight into the questions asked. The discussions on positive and negative impacts were varied, but there was consensus on the need for clarification in regulations as well as enforcement, and the importance of economic development for the City. The interviews helped to further delve into the nuances needed in regulatory changes related to density, zoning, and onsite operators. Most of the interviewees thought that there should not be regulatory differences by neighborhood but mostly agreed that transient lodging uses belong in commercial and mixed-use districts. Interview responses

further underlined the need to examine transient lodging uses based on occupancy and scale while streamlining regulatory requirements and simplifying use standards. When discussing safety or nuisance related regulations, the consensus was on the need for more enforcement rather than more regulation. The majority of interview participants agreed that transient lodging use fees should be connected to affordable housing, and that hosting platforms should be regulated more thoroughly.

4.3 Public Comment Feedback

In addition to the stakeholder interviews, the Project Team received feedback through public comments via emails, phone calls, and informal, in-person interactions. There were 26 individual comments, 16 of which reflected a more negative view of CSTRs, and 6 of which reflected a more positive review of CSTRs. The more negative comments included the need to enforce stricter regulations on CSTRs, particularly in the Bywater and Tulane-Gravier area. One stakeholder emphasized that STRs are prohibited in the French Quarter, and the minimum rental time is 60 days. Commenters further pointed out that CSTRs are harming neighborhood character and quality of life, reducing housing opportunities, pricing residents out of their homes, and causing safety and security issues. The comments with a more positive view of CSTRs emphasized support for CSTRs in commercial and mixed-use districts in the Central Business District, Marigny, French Quarter, Bayou Road, and Educational Campus Districts. They further pointed out that the Lakeview Single-Family Residential District and the Lake Vista and Lake Shore Single-Family Residential District should have the same NSTR regulations. Commenters also recommended improving regulations to include large, medium, and small Transient Lodging Uses, and stopping the use of conditional use permits. They further emphasized the need to streamline and be more transparent about CSTR regulations.

APPENDIX C

COMPREHENSIVE ZONING ORDINANCE CODE RECOMMENDATIONS

Generally.

Amend the New Orleans Comprehensive Zoning Ordinance to enact the recommendations of the Transient Lodging Use Study to update and streamline the City's existing transient lodging use zoning and land use regulations to be more restrictive, reflect the variety of these uses and their associated impacts in built environment, and promote a fair market and open competition, where**::**

a. Black text = existing code staying where it is
b. **Blue text = new code**
c. ~~Red strikethrough~~ = deleted old text
d. Three * * * indicate existing code skipped over and unchanged.

Recommendation 1.

Within Article 20 – Use Standards, combine Bed and Breakfasts terms (principal and accessory) into one, streamlined term and clarify minimum standards (signs, cooking facilities, meal service, special events, block interpretation) and maintain a bedroom limit of 5 maximum consistent with existing accessory bed and breakfasts, and a 1 per block density limitation, where NSTRs and Bed and Breakfasts are included in the residential block density calculation, and CSTRs are included the in the mixed-use or commercial block density calculation, to read as follows:

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE

ARTICLE 10 – HISTORIC CORE NEIGHBORHOODS NON-RESIDENTIAL DISTRICTS

* * *

10.1.F PURPOSE OF THE VCS-1 VIEUX CARRÉ SERVICE DISTRICT

The VCS-1 Vieux Carré Service District is intended to provide for the redevelopment of areas near the Mississippi River that were historically developed with industrial and commercial uses as a mixed-use area, with ground-floor retail and commercial uses and residential uses above. This district also promotes the improvement, beautification and redevelopment of existing surface parking lots and their redevelopment with structured parking and a mixture of commercial and residential uses. Existing commercial uses that do not adversely affect residential uses or the overall character of the Vieux Carré are also intended to be accommodated in the VCS-1 District. ~~Hotels may be considered as part of the redevelopment of historic structures through the conditional use process.~~

* * *

ARTICLE 20 – USE STANDARDS

* * *

20.3.I BED AND BREAKFAST

In addition to the regulations below, all bed and breakfasts shall comply with the regulations of the Department of Safety and Permits and the Department of Finance, Bureau of Revenue.

1. ***Management*: Operator-occupied. Applicant must submit at least three (3) pieces of proof of residence to the Department of Safety and Permits.**
2. ***Structure*: Single-family dwelling. There can be no appearance of a business use other than a permitted sign.**
3. ***Sign*: One (1) sign is permitted per applicable zoning regulations.**
4. ***Transient dwelling unit*: None.**
5. ***Guestroom/sleeping accommodations*: Five (5) maximum.**
6. ***Density*: One (1) per lot and block.**
7. ***Additional clarifications and standards*:**
    a. ***Bathrooms.* Common bathroom facilities may be provided rather than private baths for each guest bedroom.**
    b. ***Block limitations*. A city block is a City-designated square, provided that where a square designation does not exist or cannot be identified, a block is defined as: (1) a portion of land enclosed by public rights-of-way, or (2) a portion of land enclosed by any combination of public rights-of-way, railroads, canals, bayous, rivers, and boundary lines of the City, whichever is smallest. The one (1) per lot and block rule applies across all Bed and Breakfasts and NSTRs on a block, where there can be no more than one (1) of these uses per block.**
    c. ***In-room cooking facilities*. Cooking facilities are prohibited in individual guest rooms.**
    d. ***Meal service.* If meals are provided, only registered guests may be served. If the zoning district allows restaurants and the facility meets all other applicable city and state codes for food service, meals may be served to guests other than those registered with the bed and breakfast.**
    e. ***Event space*. Leasing of common areas for special events or receptions shall not be allowed on site, unless the zoning district allows reception facilities and the facility meets all applicable off-street parking requirements, noise ordinances, and all other provisions of the City Code.**

~~20.3.I.1 BED AND BREAKFAST ACCESSORY STANDARDS~~

~~a. Proof of operator occupancy shall be established by submission of at least three (3) pieces of proof of residence to the Department of Safety and Permits.~~

~~b. The bed and breakfast shall appear outwardly to be a single-family dwelling, giving no appearance of a business use other than a permitted sign.~~

~~c. The bed and breakfast may have one (1) attached projecting sign not to exceed four (4) square feet in area. The sign shall complement the architecture of the structure.~~

~~d. The bed and breakfast is limited to a maximum of five (5) units for overnight accommodation.~~

~~e. Cooking facilities are prohibited in individual guest rooms.~~

~~f. If meals are provided, only registered guests may be served.~~

~~g. Leasing of a common dining area for social events is prohibited.~~

~~h. In residential districts and HU-B1A Neighborhood Business District, HU-B1 Neighborhood Business District, HU-MU Neighborhood Mixed-Use District, S-LM Lake Area Marina District, MU-1 Medium Intensity Mixed-Use District, and MU-2 High Intensity Mixed-Use District, only one (1) Accessory Bed and Breakfast, one (1) Principal Bed and Breakfast, or one (1) Non-Commercial Short Term Rental is permitted within each city block, inclusive of all lots fronting any exterior boundary of said block and all interior lots not fronting the public right of way, may be permitted for use as a non-commercial short term rental.~~

~~20.3.I.2 BED AND BREAKFAST PRINCIPAL STANDARDS~~

~~a. Proof of operator occupancy shall be established by submission of at least three (3) pieces of proof of residence to the Department of Safety and Permits.~~

~~b. All signs shall comply with applicable sign regulations for the zoning district.~~

~~c. The bed and breakfast is limited to a maximum of nine (9) units for overnight accommodation.~~

~~d. Cooking facilities are prohibited in individual guest rooms.~~

~~e. If the zoning district allows restaurants, meals may be served to guests other than those registered with the bed and breakfast, provided the facility meets all other applicable city and state codes for food service.~~

~~f. Leasing of common areas for social events shall be allowed, provided the facility meets all applicable off-street parking requirements and complies with the noise ordinance and all other provisions of the City Code.~~

~~g. In residential districts and HU-B1A Neighborhood Business District, HU-B1 Neighborhood Business District, HU-MU Neighborhood Mixed-Use District, S-LM Lake Area Marina District, MU-1 Medium Intensity, Mixed-Use District, and MU-2 High Intensity Mixed-Use District, only one (1) Accessory Bed and Breakfast, one (1) Principal Bed and Breakfast, or one (1) Non-Commercial Short Term Rental is permitted within each city block, inclusive of all lots fronting any exterior boundary of said block and all interior lots not fronting the public right of way.~~

* * *

Recommendation 2.

Add use and density standards for Commercial Short Term Rentals within Article 20 – Use Standards, existing Sec. 20.3.LLL to reaffirm CSTRs as small, private, unique temporary lodging spaces distinguished from bed and breakfasts and hotels/motels, defined and regulated as follows. Specifically, add three (3) types of CSTRs to conform with current land uses: CSTR-Small (CSTR-S), CSTR-Medium (CSTR-M), and CSTR-Large (CSTR-L). Include block limitations for all CSTR uses in order to control the density of each type in the City, to read as follows:

* * *

20.3.LLL SHORT TERM RENTALS

20.3.LLL.1 SHORT TERM RENTALS GENERAL STANDARDS

a. In addition to the use standards below, all short term rentals shall comply with the regulations of the Department of Safety and Permits and the Department of Finance, Bureau of Revenue.

b. All short term rentals shall require a permit. The permit shall be prominently displayed on the front facade of the property at a reasonable height in a location clearly visible from the street and accessible from the public right-of-way during all period of occupancy and contain the permit number, the contact information for the owner or operator, the permit type (Non-Commercial or Commercial) and the bedroom and occupancy limit.

c. Short term rentals shall not be operated outdoors, in an accessory structure, or in a recreational vehicle.

d. Only one party of guests shall be permitted per short term rental unit.

e. Both Commercial and Non-Commercial short term rentals shall be considered dwelling units for density purposes and subject to the minimum lot area per dwelling unit requirement of the applicable zoning district.

f. A short term rental permit shall be secured prior to operation; and short term rental operators shall comply with all applicable permit requirements provided in the Code of the City of New Orleans.

h. The rental of kitchens, dining rooms, living rooms, offices, and other common spaces may be used as part of the short term rental but shall not be rented as guest bedrooms. Only legally permitted bedrooms shall be used for the purposes of calculating the maximum number of guests. Studio apartments and dwelling units shall be considered to have one (1) guest bedroom and allowed a maximum of two (2) guests.

i. Notwithstanding anything else herein to the contrary, no Short Term Rental or Bed and Breakfast shall be permitted within the boundaries of the Garden District, which for purposes of this subsection shall be defined as follows: the center line of St. Charles Avenue, downriver side of Jackson Avenue, center line of Magazine Street, and downriver side of Louisiana Avenue. This provision shall not be waived.

20.3.LLL.2 SHORT TERM RENTAL, COMMERCIAL STANDARDS

a. ***Permits.*** The permit shall be prominently displayed on the front facade of the property in a location clearly visible from the street or on the exterior of the front door of the dwelling unit being rented for multi-family dwellings, during all periods of occupancy and contain the permit number, the contact information for the permitted operator, the permit type (Commercial) and the unit, guest bedroom and occupancy limit. **The permit shall comply with all applicable City Code standards.**

~~b. Up to five (5) guest bedrooms may be rented to guests in each unit and occupancy shall be limited to two (2) guests per guest bedroom with a maximum ten (10) guests.~~

~~c. Commercial Short Term Rentals shall be prohibited on the first floor of a multi-story structure that contains or can contain residential uses on subsequent floors, but (1) does not apply to buildings that are single- or two-family dwellings; (2) does not apply to single-story structures; (3) does not apply to the CBD Central Business Districts, except when the structure is a new construction or a substantial improvement, EC Education Campus, MC Medical Campus, LS Life Science, and M-MU Maritime Mixed Use Districts, nor the MI Maritime Industrial Commercial and Recreational Subdistrict.~~

b. ***Plans.*** A Commercial Short Term Rental shall submit the following impact management plans, to be reviewed by the Director of Safety and Permits, and all other relevant City agencies:

i. Noise abatement plan;

ii. A security and operation plan; and

iii. A sanitation plan.

~~e. No more than one (1) unit or twenty-five (25) percent of total units on a lot or a single building constructed across lot lines, whichever is greater, shall be permitted as a~~

~~Commercial Short Term Rental. In the CBD-5 Urban Core Neighborhood Lower Intensity Mixed-Use District, the Commercial Short Term Rental shall only be authorized when the total number of housing units is at least ten (10) and triggers the Mandatory Inclusionary Zoning regulations of Article 28. This cap shall not apply to the VCE Vieux Carré Entertainment District, to structures which front on Canal Street between the Mississippi River and Rampart Street, the EC Educational Campus District, MC Medical Campus District, LS Life Science District, or the MI Maritime Industrial District Commercial and Recreational Subdistrict.~~

~~f. Any structure that contains 10 or more dwelling units that are used as short term rentals shall have a designated and permitted Operator as required by the Code of the City of New Orleans.~~

c. *CSTR use classifications and specific standards.* The following Commercial Short Term Rental land use classifications and standards shall apply in accordance with definitions in Article 26 – Definitions of this CZO:

i. Short Term Rental, Small (CSTR-S).

a. *Management:* A designated and permitted operator must be on call and available to address neighborhood complaints or guest questions twenty-four (24) hours a day, seven (7) days a week. Failure to respond to a call or neighborhood complaint within one (1) hour, over the course of three (3) occurrences within two (2) weeks, shall be a violation of the CSTR license and grounds for revocation.

b. *Structure:* Traditional shotgun two-family or multi-family dwelling with a maximum of four (4) dwelling units OR Dwelling, Above the Ground Floor in a multi-story mixed-use building.

c. *Transient dwelling unit:* One (1) maximum.

d. *Guestroom/sleeping accommodations:* Two (2) guest bedrooms and four (4) occupants maximum.

e. *Density*: Limited to one (1) per building, lot, and block.

f. *Additional clarifications and standards.*

i. *Prohibitions.* Whole home single-family dwellings in use as a CSTR-S are prohibited.

ii. *Block limitations*. A city block is a City-designated square, provided that where a square designation does not exist or cannot be identified, a block is defined as: (1) a portion of land enclosed by public rights-of-way, or (2) a portion of land enclosed by any combination of public rights-of-way, railroads, canals, bayous, rivers, and boundary lines of the City, whichever is

smallest. The one (1) per lot and block rule applies across all CSTR-S, CSTR-M, and CSTR-Ls on a block, where there can be no more than one (1) of these uses per block. The one (1) per block limitation shall apply to the structure, not the license. If there is no clear street grid pattern in the applicable area, a block shall be measured at a length of three-hundred (300) linear feet.

ii. Short Term Rental, Commercial – Medium (CSTR-M).

a. *Management:* A designated and permitted operator must be on call and available to address neighborhood complaints or guest questions twenty-four (24) hours a day, seven (7) days a week. Failure to respond to a call or neighborhood complaint within one (1) hour, over the course of three (3) occurrences within two (2) weeks, shall be a violation of the CSTR license and grounds for revocation. All dwelling units used for guest stays as part of a CSTR-M permit must be managed as a single land use activity by the same entity.

b. *Structure:* Multi-family dwelling or mixed-use, multi-story building.

c. *Transient dwelling unit:* Four (4) maximum per building or twenty-five (25) percent, whichever is less, or no more than four (4) CSTR-Ms or ten (10) percent of the building, whichever is more, in the CBD-1, CBD-2, CBD-3, CBD-4, CBD-5, CBD-6, CBD-7, EC, MC, MS, and LS zoning districts.

d. *Guestroom/sleeping accommodations:* Maximum of two (2) guest bedrooms and six (6) occupants per unit.

e. *Citywide density limitations:*

i. No more than four (4) CSTR-M or twenty-five (25) percent maximum, whichever is less, per building and lot.

ii. No more than one (1) building with CSTR-Ms maximum per city block. If there is no clear street grid pattern in the applicable area, a block shall be measured at a length of three-hundred (300) linear feet.

iii. CSTR-Ms may have up to four (4) permits in one building but must have the same licensed operator for all units.

f. *Density limitations specific to the CBD-1, CBD-2, CBD-3, CBD-4, CBD-5, CBD-6, CBD-7, EC, MC, MS, and LS zoning districts.*

i. No more than four (4) CSTR-Ms or ten (10) percent of the building, whichever is more, per building and lot.

ii. No more than three (3) buildings with CSTR-Ms maximum per city block.

iii. CSTR-M permits within the same building must have the same operator for all units.

g. *Additional clarifications and standards.*

i. *Prohibitions.* Whole home single-family dwellings in use as a CSTR-M are prohibited.

ii. *Block limitations.* A city block is a City-designated square, provided that where a square designation does not exist or cannot be identified, a block is defined as: (1) a portion of land enclosed by public rights-of-way, or (2) a portion of land enclosed by any combination of public rights-of-way, railroads, canals, bayous, rivers, and boundary lines of the City, whichever is smallest. Density limits apply across all CSTR-S, CSTR-M, and CSTR-Ls on a block, where there can be no more than one (1) or three (3) of these uses per block in accordance with this section. If there is no clear street grid pattern in the applicable area, a block shall be measured at a length of 300 linear feet. The one (1) per block and three (3) per block limitation shall apply to the structure, not the license.

iii. Short Term Rental, Commercial – Large (CSTR-L).

a. *Management:* A designated and permitted operator must be on call and available to address neighborhood complaints or guest questions twenty-four (24) hours a day, seven (7) days a week. Failure to respond to a call or neighborhood complaint within one (1) hour, over the course of three (3) occurrences within two (2) weeks, shall be a violation of the CSTR license and grounds for revocation.

b. *Structure:* Whole home single family dwelling.

c. *Transient dwelling unit:* One (1) maximum.

d. *Guestroom/sleeping accommodations*: Seven (7) bedrooms and twenty (20) occupants per unit maximum.

e. *Density.* Limited to one (1) per building, lot, and block.

f. *Additional clarifications and standards.*

i. *Block limitations.* A city block is a City-designated square, provided that where a square designation does not exist or cannot be identified, a block is defined as: (1) a portion of land enclosed by public rights-of-way, or (2) a portion of land enclosed

by any combination of public rights-of-way, railroads, canals, bayous, rivers, and boundary lines of the City, whichever is smallest. The one (1) per lot and block rule applies across all CSTR-S, CSTR-M, and CSTR-Ls on a block, where there can be no more than one (1) of these uses per block. If there is no clear street grid pattern in the applicable area, a block shall be measured at a length of three-hundred (300) linear feet. The one (1) per block limitation shall apply to the structure, not the license.

* * *

Recommendation 3.

Add use standards within **Article 20 – Use Standards**, in a new **Sec. 20.3.ZZZ** for Hostels to add minimum standards that align with other the treatment of similar transient lodging uses, to read as follows:

* * *

20.3.ZZZ HOSTEL STANDARDS

1. ***Management*: Must have an on-site operator twenty-four (24) hours a day, seven (7) days a week.**
2. ***Structure*: Must be located in a building designed for hostel accommodations.**
3. ***Transient dwelling unit*: None.**
4. ***Guestroom/sleeping accommodations*: Sleeping accommodations must be limited to two (2) occupants unless the room contains seventy (70) square feet of floor area per occupant or bed. No more than six (6) occupants per sleeping room.**
5. ***Additional clarifications and standards*: Common bathroom facilities may be provided rather than private baths for each guest bedroom.**

* * *

Recommendation 4.

Incorporate hotel and motel land use standards into the Comprehensive Zoning Ordinance, within Article 20-Use Standards, into a new "Sec. 20.4.A – Hotel / Motel Standards for all Districts" that are different and in addition to those standards included in the City of New Orleans Code of Ordinances, to read as follows:

* * *

20.4.A HOTEL / MOTEL STANDARDS FOR ALL DISTRICTS

1. ***Regulations:*** **All hotels and motels shall comply with the regulations of the Department of Safety and Permits, the Department of Finance, Bureau of Revenue, the State Fire Marshal, and the adopted state uniform construction code prior to obtaining a certificate of occupancy in accordance with the City of New Orleans Code of Ordinances and this CZO.**

2. ***Customary lodging services*****: Customary lodging services should have a restroom available for staff at all hours.**

3. ***Hotel/motel land use classifications and specific standards.*** **The following Hotel/Motel land use classifications and standards shall apply in accordance with definitions in Article 26 – Definitions of this CZO.**

    a. **Hotel/Motel, Neighborhood.**

        i. ***Management:*** **Must have customary lodging services.**

        ii. ***Structure:*** **Single-family dwelling or traditional hotel structure, such as a multi-storied building with a lobby and elevator.**

        iii. ***Transient dwelling unit:*** **Twenty (20) maximum.**

        iv. ***Guestroom/sleeping accommodations:*** **No limit.**

        v. ***Additional clarifications and standards.***

            a. ***Ancillary uses.*** **May include hotel ancillary uses in accordance with the base zoning district.**

    b. **Hotel/Motel, Large.**

        i. ***Management:*** **Must have customary lodging services.**

        ii. ***Structure:*** **Large hotel structure.**

        iii. ***Transient dwelling unit*****: Twenty-one (21) or more.**

        iv. ***Guestroom/sleeping accommodations:*** **No limit.**

        v. ***Additional clarifications and standards.***

            a. ***Ancillary uses.*** **May include hotel ancillary uses. Related ancillary uses may include, but are not limited to conference and meeting rooms, restaurants, sale of convenience items, bars, and recreational facilities. These ancillary uses are inherent uses allowed by right in Hotel/Motel, Large.**

* * *

Recommendation 5.

Adopt mutually exclusive transient lodging definitions (i.e.; consistently comparing "apples to apples") to support consistent code interpretation, public and user understanding, and apply land use regulations in a fair and predictable manner across the City. Mirror use standards and proposed amendments in Article 20 to avoid conflicting language. Add terms that support user understanding and explain transient lodging uses in more detail within each definition (including images) to help the reader understand (and imagine) the use as distinguished from other similar uses. Include regulatory language in list form, consistent from one definition to another so as to easily differentiate changes in requirements across all uses, to read as follows:

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE

ARTICLE 26 – DEFINITIONS

* * *

ARTICLE 26 – DEFINITIONS

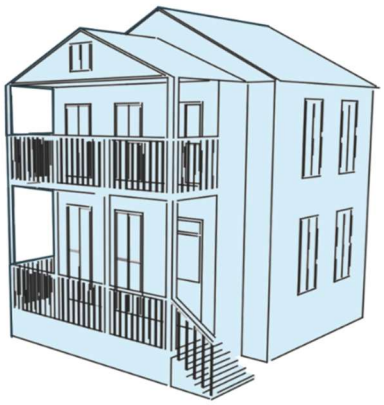
* * *

SEC. 26.6 DEFINITIONS

* * *

Bed and Breakfast. ~~A single-family dwelling, or other structure that has been legally converted to a single-family dwelling, that provides sleeping rooms for overnight paid occupancy. Bed and breakfast is further defined as follows:~~ An operator-occupied single-family dwelling, or other structure that has been legally converted to a single-family dwelling, that provides sleeping rooms for overnight paid occupancy **for up to thirty (30) nights. Bed and Breakfasts are characterized by: (1) overnight visitors renting a room within a home or residential dwelling; (2) in-room meal services; (3) shared common spaces; (4) in-person host-interactions upon arrival, throughout the guest's stay, and upon departure; and (5) a Bed and Breakfast can provide no more than five (5) guest bedrooms. Common bathroom facilities may be provided rather than private baths for each guest bedroom.**

Example: Bed & Breakfast within a Single-Family Dwelling.



~~**A. Bed and Breakfast, Accessory**. An operator-occupied single-family dwelling, which provides no more than five (5) guest bedrooms for overnight paid occupancy of up to thirty (30) nights. Common bathroom facilities may be provided rather than private baths for each guest bedroom.~~

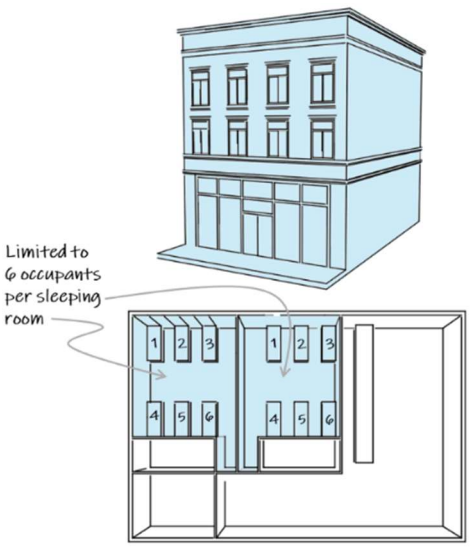
~~**B. Bed and Breakfast, Principal**. An operator-occupied single-family dwelling that provides no more than nine (9) guest bedrooms for overnight paid occupancy of up to thirty (30) nights. Common bathroom facilities may be provided rather than private baths for each guest bedroom.~~

* * *

Hostel. An establishment providing sleeping accommodations for a fee in a sociable accommodation where guests can rent a bed in a dormitory and share bathroom, lounge, and kitchen facilities **for up to thirty (30) nights.**

Hotel/Motel, General. An establishment providing a private room for sleeping accommodations for a fee with private bathroom facilities and customary lodging services **for up to thirty (30) nights.** ~~Related~~

Example Hostel.



~~ancillary uses may include, but are not limited to conference and meeting rooms, restaurants, sale of convenience items, bars, and recreational facilities.~~

Hotels shall be permitted to include units for sale designed or used exclusively for permanent residential use in all districts except in Light Industrial (LI), Heavy Industrial (HI), and Business Industrial Park (BIP) districts. **Prior to the issuance of a Certificate of Occupancy and/or Occupational License the hotel or motel shall be in compliance with all federal, state, and local laws and commercial transient lodging building codes. Hotel/Motel land use classifications are further defined as follows:**

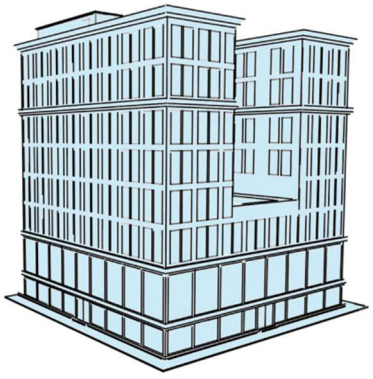
Example: Neighborhood Hotel, limited to 20 units.



A. Hotel/Motel, Neighborhood. An establishment having no more than twenty (20) units [limited to no more than two (2) guest bedrooms per unit] with private bathroom facilities. The establishment shall be a neighborhood-oriented single-family dwelling or traditional hotel structure, such as multi-storied buildings with a lobby and elevator. "Neighborhood-oriented" specifically refers to a site design that takes into account neighboring structures and features and emphasizes the essential character of a neighborhood. For example, the site design must (1) match the predominant neighborhood building scale and historic or contributing architectural features, (2) mitigate potential negative impacts through landscape and hardscape features that provide screening, and (3) orient parking features and elements away from existing residential dwellings.

B. Hotel/Motel, Large. An establishment having twenty-one (21) or more units with private bathroom facilities. This hotel type includes larger hotels having more than two (2) guest rooms per unit, such as multi-storied buildings with a lobby or elevator owned by a franchise. Related ancillary uses may include, but are not limited to conference and meeting rooms, restaurants, sale of convenience items, bars, and recreational facilities.

Example Large Hotel, over 20 units.



* * *

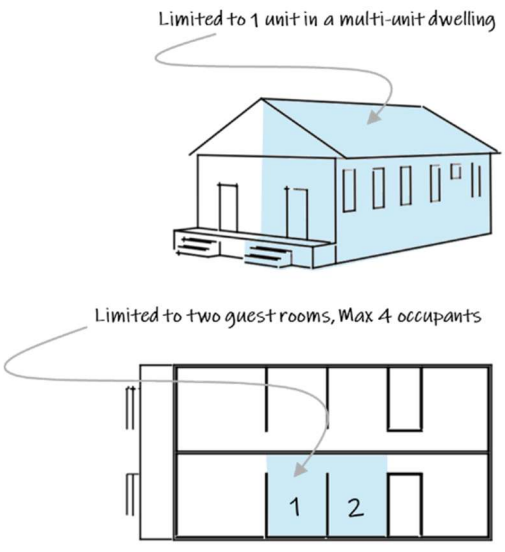
Short Term Rental. ~~Short Term Rental.~~ The use and enjoyment by guests of a Dwelling Unit, or any portion thereof, for a period of less than thirty (30) consecutive days~~, in exchange for money, commodities, fruits, services, or other performances.~~ Hotels, motels, bed and breakfasts, **and hostels,** and other land uses explicitly defined and regulated in the CZO separately from Short-Term Rentals are not considered to be Short-Term Rentals. A short term rental is further defined as follows:

A. **Short Term Rental, Non-Commercial.** A short term rental where the operator, who may not be a guest, physically resides in a bedroom on the lot of record containing the short-term rental during any guest stays and, if required by the City Code, maintains a primary residence on the lot of record. In some cases, the operator-occupant may be the property owner. The operator and all owners of the property must be natural persons aged 18 years or over. Non-Commercial Short Term Rental is a temporary use as described in Article 21. Only one (1) Non-Commercial short term rental license is allowed per lot, and each permit shall provide no more than three (3) guest bedrooms and six (6) total guests for overnight paid occupancy as a temporary use. Only one lot within each city block, inclusive of all lots fronting any exterior boundary of said block and all interior lots not fronting the public right of way, may be permitted for use as a non-commercial short term rental.

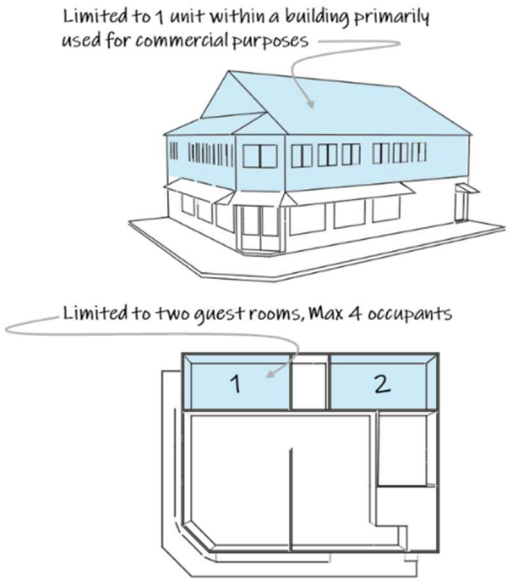
B. **Short Term Rental, Commercial.** An establishment providing ~~rental of one (1) or more~~ dwelling units for overnight paid occupancy **in accordance with this section where guest accommodations are designed to offer a unique, private, home-like, stay.** ~~Each dwelling unit is limited to five (5) guest bedrooms and no more than ten (10) occupants.~~ **Short Term Rental, Commercial is further defined as follows:**

1. ***Short Term Rental, Small (CSTR-S).*** **One (1) unit located in a multi-unit dwelling having a maximum of two (2) guest bedrooms and four (4) occupants, OR one unit located in a Dwelling, Above the Ground Floor in a multi-story mixed-use building, wherein the unit has a maximum of two (2) guest bedrooms and four (4) occupants.**

Example CSTR-S within a duplex.

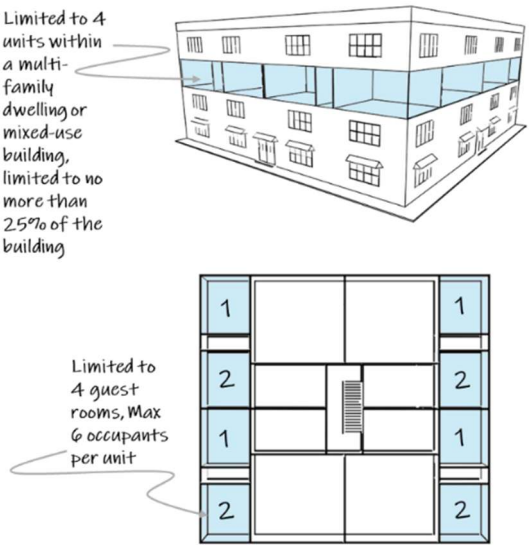


Example: CSTR-S within a mixed-use building.



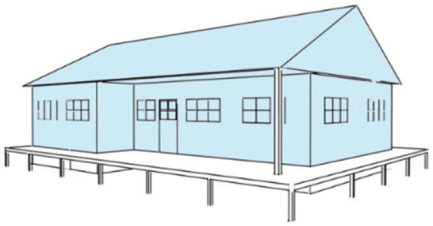
2. ***Short Term Rental, Commercial – Medium (CSTR-M).*** **Two (2) to four (4) units within a multi-family dwelling or mixed-use multi-story building, limited to no more than twenty-five percent (25%) of the building, with a maximum of two (2) guest bedrooms and six (6) occupants per unit. In the CBD-1, CBD-2, CBD-3, CBD-4, CBD-5, CBD-6, and CBD-7, EC, MC, MS, and LS zoning districts, no more than four (4) CSTR-Ms or ten (10) percent of the building, whichever is more, per building and lot.**

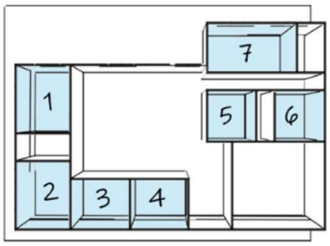
Example CSTR-M within a multi-family building.



3. ***Short Term Rental, Commercial – Large (CSTR-L).*** **A whole home single family dwelling with up to seven (7) guest bedrooms and no more than twenty (20) occupants maximum.**

Example CSTR-L within a whole home single-family structure.





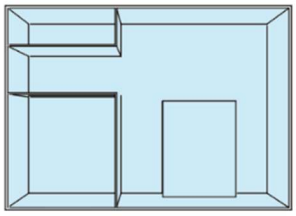
* * *

Timeshare Building. A building containing condominium units, rooms or suites of rooms, with or without culinary facilities and subject to a timeshare plan. The construction of or conversion to timeshare buildings must be registered with the Department of Safety and Permits by applying for a Certificate of Use and Occupancy.

Timeshare Dwelling Unit. A condominium unit, room or suite of rooms within a Timeshare Building. Generally, Timeshares are characterized by shared ownership where multiple owners occupy the unit at different parts of the year. Timeshare Dwelling Units may not be used as a Short Term Rental, Commercial.

Example Timeshare Dwelling Unit in a Condominium Building.





Timeshare Plan. Any plan or program in which the use, occupancy, or possession of one (1) or more condominium units, rooms, or suites of rooms in a timeshare building circulates among various unrelated persons for a specific or discernible period by temporal division of less than a sixty (60) day period in any year for any occupant. Timeshare plans include timeshare ownership plans and timeshare use plans, as follows:

A. Timeshare ownership plan is any arrangement, whether through common ownership, sale or by other means, whereby a person receives an ownership interest in a condominium unit, room, or suite of rooms in a timeshare building.

B. Timeshare use plan is any arrangement, excluding normal hotel operations, whether by membership agreement, lease, rental agreement, license, use agreement, security, or other means, whereby a person receives the right to use but not an ownership interest in a condominium unit, room, or suite of rooms in a timeshare building.

* * *

Recommendation 6.

Add and refine terms including Bedroom, Customary Lodging Services, Sleeping Accommodations / Rooms, Transient Dwelling Unit, and Transient Lodging Use, to further support consistent code interpretation across all transient lodging uses, to read as follows:

* * *

Bedroom. An enclosed private room that includes an operable window and a door that opens to a space other than another bedroom, bathroom, half-bath or toilet room.

* * *

Customary Lodging Services. Guest services provided by lodging **uses** ~~facilities~~ including hotels/motels. Customary services include at a minimum 1) dedicated lobby space to adequately enable check-in/check-out procedures **with a restroom (private or public) available for staff at all hours**, and 2) personnel/staffing to assist guests at check-in/check-out; and 3) at least one on-site, on-duty staff member that is physically present at all times and capable of immediately assisting guests, overseeing operations of the facility, addressing safety and security matters**,** and responding to emergencies.

* * *

Guest Stay. The length of time a party of guests makes use of a transient lodging use.

* * *

Sleeping Accommodations / Rooms. Rooms intended and designed for sleeping that provide adequate accommodations for each guest, such as a bed, bunk, or other furniture designed for sleeping.

* * *

Transient Dwelling Unit. A room, or group of rooms, providing complete, independent living facilities, including temporary provisions for living, sleeping, eating, cooking and sanitation for one or more persons.

Transient Lodging Use. An establishment that receives payment in exchange for a transient dwelling unit or sleeping accommodation for one (1) to thirty (30) days, including any Bed and Breakfast, Commercial Short Term Rental, Hostel, Hotel / Motel, or Noncommercial Short Term Rental.

* * *

Recommendation 7.

The table on the following pages reflects recommended transient lodging land use allowances in each City zoning district* to provide both broad and neighborhood-specific land use regulations based upon the City's land use history, study background, data analysis, and community and stakeholder engagement. In summary, recommendations include:

- In general, recommendations were made based on the purpose and function of a zoning district. Residential uses like Bed and Breakfasts are targeted to residential areas, commercial uses like CSTRs are targeted to mixed use and commercial areas, and hotels are targeted to commercial and industrial areas.
- In lower impact neighborhoods, the purpose and function of the zoning district led the proposed district recommendations.
- Removing Bed and Breakfasts from non-residential districts where they are currently permitted.
- Changing Bed and Breakfast allowances from conditional use to by right.
- Retaining hostels and timeshares in the same zoning districts as currently permitted.
- Targeting mixed-use areas for small, neighborhood boutique hotels.
- Prohibiting and restricting transient lodging use expansion in higher impact neighborhoods identified by survey respondents, including the Bywater, Marigny and Seventh Ward.
- Allowing transient lodging uses in CBD, despite the area being identified as a higher impact neighborhood by survey respondents, based on the stakeholder interviewees and citywide land use analysis.
- Permitting Large Hotels by conditional use in the MU-2, due to its close proximity to residential districts.

Note: Recommendations include the continuation of legally nonconforming uses, where all operating uses with a license will be "grandfathered" into the new regulations.

TABLE: ZONING DISTRICT RECOMMENDATIONS

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE (CZO)	SUB-DISTRICT	TRANSIENT LODGING USE TYPES											
		BED AND BREAKFAST	~~BED AND BREAKFAST, ACCESSORY~~	~~BED AND BREAKFAST, PRINCIPAL~~	HOSTEL	~~HOTEL/MOTEL~~	HOTEL/MOTEL, NEIGHBORHOOD	HOTEL/MOTEL, LARGE	~~SHORT TERM RENTAL, COMMERCIAL~~	SHORT TERM RENTAL, COMMERCIAL – SMALL	SHORT TERM RENTAL, COMMERCIAL – MEDIUM	SHORT TERM RENTAL, COMMERCIAL – LARGE	TIMESHARE
Article 7: Open Space Districts	OS-N												
	OS-G												
	OS-R												
	NA												
	GPD					~~C~~	C	C	~~C~~			C	
	OS-CBD												
	OS-AR												
Article 8: Rural Development Districts	R-RE		~~C~~										
	M-MU	P	~~C~~	~~C~~					~~P~~	P	P	P	
Article 9: Historic Core Neighborhoods Residential Districts	VCR-1												
	VCR-2												
	HMR-1	P	~~C~~	~~C~~									
	HMR-2	P	~~C~~	~~C~~									
	HMR-3	P	~~C~~	~~C~~									
Article 10: Historic Core Neighborhoods Non-Residential Districts	VCC-1												
	VCC-2												
	VCE	P	~~C~~	~~C~~					~~P~~	P	P		
	VCE-1						P			P	P		
	VCS												
	VCS-1												
	VCP												
	HMC-1		~~C~~	~~C~~					~~C~~				
	HMC-2		~~C~~	~~C~~	P	~~P~~			~~P~~				

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE (CZO)	SUB-DISTRICT	TRANSIENT LODGING USE TYPES											
		BED AND BREAKFAST	~~BED AND BREAKFAST, ACCESSORY~~	~~BED AND BREAKFAST, PRINCIPAL~~	HOSTEL	~~HOTEL/MOTEL~~	HOTEL/MOTEL, NEIGHBORHOOD	HOTEL/MOTEL, LARGE	~~SHORT TERM RENTAL, COMMERCIAL~~	SHORT TERM RENTAL, COMMERCIAL – SMALL	SHORT TERM RENTAL, COMMERCIAL – MEDIUM	SHORT TERM RENTAL, COMMERCIAL – LARGE	TIMESHARE
	HM-MU		~~C~~	~~C~~		~~C~~			~~P~~				
Article 11: Historic Urban Neighborhoods Residential Districts	HU-RS	P	~~C~~										
	HU-RD1	P	~~C~~										
	HU-RD2	P	~~C~~										
	HU-RM1	P	~~C~~	~~C~~									
	HU-RM2	P	~~C~~	~~C~~									
Article 12: Historic Urban Neighborhoods Non-Residential Districts	HU-B1A		~~C~~	~~C~~			C						
	HU-B1		~~C~~	~~C~~			C						
	HU-MU		~~C~~	~~C~~		~~C~~	C		~~P~~				
Article 13: Suburban Neighborhoods Residential Districts	S-RS	P	~~C~~										
	S-RD	P	~~C~~										
	S-RM1	P	~~C~~										
	S-RM2	P	~~C~~										
	S-LRS1	P	~~C~~										
	S-LRS2	P											
	S-LRS3	P											
	S-LRD1	P											
	S-LRD2	P	~~C~~										
	S-LRM1	P	~~C~~										
	S-LRM2	P	~~C~~										
Article 14: Suburban Neighborhoods Non-Residential Districts	S-B1[5]												
	S-B2[6]								~~P~~	P			
	S-LB1[5&7]		~~C~~	~~C~~			P			P			
	S-LB2[5&8]		~~C~~	~~C~~			P		~~P~~	P			
	S-LC[9]		~~C~~	~~C~~	C	~~C~~	P		~~P~~		P		P

NEW ORLEANS COMPREHENSIVE ZONING ORDINANCE (CZO)	SUB-DISTRICT	TRANSIENT LODGING USE TYPES											
		BED AND BREAKFAST	~~BED AND BREAKFAST, ACCESSORY~~	~~BED AND BREAKFAST, PRINCIPAL~~	HOSTEL	~~HOTEL/MOTEL~~	HOTEL/MOTEL, NEIGHBORHOOD	HOTEL/MOTEL, LARGE	~~SHORT TERM RENTAL, COMMERCIAL~~	SHORT TERM RENTAL, COMMERCIAL – SMALL	SHORT TERM RENTAL, COMMERCIAL – MEDIUM	SHORT TERM RENTAL, COMMERCIAL – LARGE	TIMESHARE
	S-MU		~~C~~				P		~~P~~	P			
	S-LP												
	S-LM					~~C~~	P		~~P~~	P	P	P	
Article 15: Commercial Center & Institutional Campus Districts	C-1				P	~~P~~	P		~~P~~	P	P		
	C-2				P	~~P~~	P	P	~~P~~	P	P	P	C
	C-3				P	~~P~~	P	P	~~P~~	P	P	P	
	MU-1		~~C~~	~~C~~	P	~~P~~	C	C	~~P~~	P	P		C
	MU-2		~~C~~	~~C~~	P	~~P~~	C	C	~~P~~	P	P		
	EC[3]	P	~~C~~		P	~~P~~	P		~~P~~	P	P		
	MC	P			P	~~P~~	P	P	~~P~~	P	P	P	C
	MS	P			P	~~P~~	P	P	~~P~~	P	P	P	C
	LS	P			P	~~P~~	P	P	~~P~~	P	P	P	C
Article 16: Centers for Industry	LI					~~P~~	P	P	~~P~~		P	P	
	HI					~~C~~	P	P	~~C~~		P	P	
	MI[2]					~~P~~	P	P	~~C~~		P	P	
	BIP				P	~~P~~	P	P	~~P~~		P	P	P
Article 17: Central Business Districts	CBD-1		~~C~~	~~C~~	P	~~P~~	P	P	~~P~~	P	P	P	P
	CBD-2		~~C~~	~~C~~	P	~~P~~	P	P	~~P~~	P	P	P	P
	CBD-3		~~C~~	~~C~~	P	~~P~~	P	P	~~P~~	P	P	P	P
	CBD-4				P	~~P~~	P	P	~~P~~	P	P	P	P
	CBD-5		~~C~~	~~C~~		~~C~~	P	P	~~P~~	P	P		C
	CBD-6		~~C~~	~~C~~		~~P~~	P	P	~~P~~	P	P	P	
	CBD-7				P	~~P~~	P	P	~~P~~	P	P	P	P

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PUBLIC COMMENTS SUBMITTED TO THE CITY PLANNING COMMISSION AS OF 10/29/2025

NEIGHBORS FIRST FOR BYWATER



Neighbors First for Bywater, LLC
Julie Jones, President
(504) 944-5422
Jjones1@uno.edu

Robert D. Rivers, Executive Director
1300 Perdido St., 7th Floor
New Orleans, LA 70112

Date: April 30, 2023
Re: Hearing concerning Commercial STRs in neighborhood commercial zones

Hello Director Rivers:

I am writing at the behest of the board of Neighbors First for Bywater. We and our neighbors have been dismayed by the proliferation of large-scale short-term rental accommodations in the HMC-1 zones, which were intended to provide convenient business services to residents of the neighborhood.

These commercial STRs, usually abutting residential properties, and most typically backing up to yards our bedrooms look out on, are not only a major source of disturbance to neighbors but also offer no business services that we need. Unlike many of our residential STRs, these commercial enterprises are solely driven by the desire for profit on the part of people who for the most part have no interest in our neighborhoods.

We ask you to limit commercial STRs to zones that also accept hotels, since they operate essentially as hotels. Hotels, I would add, that do not provide a desk clerk to make sure that they don't turn into party palaces. This would eliminate STRs from HMC-1 zones and save us from the worst abuse.

In its desire for development, the CPC has too often dismissed the concerns of residents. We ask you to have mercy on us.

With thanks for your consideration and best wishes,

Julie Jones, President

w: Comment re rdi Commercial Short Term Re ls

CPCINFO
Mon 5/15/2023 8:20 AM
To: Rachael Berg <rberg@nola.gov>

From: Nathan Lott <nlott@prcno.org>
Sent: Monday, May 1, 2023 1:45 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Comments regarding Commercial Short Term Rentals

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Greetings:

Please consider the following in your evaluation of commercial short term rentals (STRs).

- **Balance -** Through adoption of the city's Master Plan, overhaul of the Comprehensive Zoning Ordinance, and revisions to Future Land Use Maps, New Orleans has shifted away from commercial zoning in favor of mixed-use designations, particularly in neighborhoods adjoining the CBD and historic core. This reflects the best thinking of urban planning today, specifically that a mix of residential, office and retail uses coexist to product vibrant neighborhoods. Where the strict bifurcation of residential and commercial zoning still dominates, it corresponds with auto-oriented pattern of urban design (e.g. Algiers, New Orleans East). If, as the Master Plan makes clear, the city's goal is to foster live-work neighborhoods and a diversity of housing options close to job centers, then New Orleans must preserve a balance of uses in mixed-use zoning. Commercial STRs present a challenge insofar as their profitability causes property owners and developers to exclude or discontinue other uses in favor of hospitality lodging, including in places where hotels are not allowed or require a conditional use (e.g., HU-B1, HU-MU). The existing provision that limits commercial STR permits to the greater of one housing unit or one-fourth of the residential units in a building was intended to maintain a proper balance. However, the recent construction of single-family structures on individual lots of record at the former Brown's Dairy site illustrates that even when the underlying zoning will allow for greater density and diversity of uses, the profitability of STRs can yield single-use developments. This suggests that to maintain the intended balance, the city should limit commercial STRs by block or other unit larger than the individual parcel. In some cases, disallowing them or subjecting them to a conditional use permit may also be advisable in order to put all hospitality uses on the same footing.

- **Building Codes** - The case of single-family "homes" constructed for STR use at the Brown's Dairy was clearly shaped by market demand for hospitality units of that type. It may also have been the result of construction costs. Timber-framed structures built to the residential building code are typically less costly per square foot than multi-unit structures built to the commercial building code. Consider, for example, that a structure of five units or more must have a fire-suppression sprinkler system and onsite stormwater management. In order to prevent a perverse incentive to under-build and to ensure the safety of all occupants, commercial STRs should be limited to

structures that meet the commercial building code. A code-compliance inspection should proceed permit issuance. This will also have the effect of leveling the playing field among hospitality uses.

Thank you,

Nathan Lott
Policy Research Director & Advocacy Coordinator
Preservation Resource Center of New Orleans
923 Tchoupitoulas St., New Orleans, LA 70130
804-370-7972 m 504-636-3049 o

Laura B. Bryan

From: Tyler Harwood <stin-g@stin-g.com>
Sent: Monday, May 1, 2023 12:59 PM
To: CPCINFO
Subject: Commercial STRs

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CPC staff,

I am writing to urge the CPC to recommend limiting commercial STRs to properties that are already zoned to allow hotels. After all, a commercial STR *is a hotel*.

Thank you for your time,

Tyler Harwood
901 Montegut St
New Orleans

Fwd: Support guests coming to New Orleans

Robert D. Rivers <rdrivers@nola.gov>
Tue 5/2/2023 8:55 AM
To: Rachael Berg <rberg@nola.gov>

Get Outlook for iOS

From: Barbara Olsen <babsolsen56@advocatefor.me>
Sent: Tuesday, May 2, 2023 4:15:28 AM
To: Robert D. Rivers <rdrivers@nola.gov>
Subject: Support guests coming to New Orleans

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Hi Executive Director Bob Rivers,

I feel that permits in good standing should be 2 per municipal block. The proposal recently presented and passed is too restrictive. Please consider .

Sincerely,
Barbara Olsen

Fwd: Welcoming guests is good for the economy

Robert D. Rivers <rdrivers@nola.gov>
Tue 5/2/2023 8:56 AM
To: Rachael Berg <rberg@nola.gov>

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From: Lawrence Gobble <lawrence@grsdelivery.com>
Sent: Tuesday, May 2, 2023 4:15:26 AM
To: Robert D. Rivers <rdrivers@nola.gov>
Subject: Welcoming guests is good for the economy

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Hi Executive Director Bob Rivers,

hello there,
My neighborhood has changed for the better since Airbnb guests have started staying close by over the past several years. It is safer and always wonderful to have new faces enjoying our City and bringing life back to the area.
I love meeting new people and telling them all the close by places to visit as well as the French Quarter and it has been a real beautiful thing to see my neighborhood not only grow and thrive from having more guests, but also become kinder and more engaging.
Lawrence Henry Gobble
Elysian Fields close to Claiborne

Sincerely,
Lawrence Gobble

Fwd: Please exempt partial units like mine from STR caps!

Robert D. Rivers <rdrivers@nola.gov>
Tue 5/2/2023 8:55 AM
To: Rachael Berg <rberg@nola.gov>

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From: Rachael DePauw <rtdepauw@sendgrassroots.com>
Sent: Tuesday, May 2, 2023 4:15:32 AM
To: Robert D. Rivers <rdrivers@nola.gov>
Subject: Please exempt partial units like mine from STR caps!

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Hi Executive Director Bob Rivers,

Hi! My name is Rachael, and I live at 4444 S. Galvez Street with my husband and 3 young children. My husband is a teacher, and I am an artist. Our homeowners insurance doubled last year, and our flood insurance and taxes continually rises well. Maintenance of these old historic homes is significant, as is raising our children. Please allow us to continue renting our partial-unit STR. We've only been on Airbnb for less than a year, but it helps our family survive financially in this expensive, challenging city — and it does not affect any affordable housing since it's not taking a unit from the market.
Many neighborhood associations and affordable housing advocates have said in their public comment that they have no problem with neighbors renting out part of their home. So why cap that? Partial units do not displace neighbors as they are spare bedrooms and do not impact housing stock, as they are underused space in someone's home. This model would give equal rights to every neighbor to do what they please inside of their primary dwelling unit, and draw a line for density caps on "full unit" rentals, like the other side of a double. This can be a smart, constitutional way to thread the needle.
The United States has a long history of allowing different rights inside of one's home vs in public. Look at how gun rights change inside of one's home vs in public, and the 3rd Amendment is all about rights of people within their own homes.
By not including partial units in density caps, and capping residential STRs to only full dwelling units, you can write the rules to protect the maximum amount of good operators who are following the rules.

Thank you for your consideration,

Sincerely,
Rachael DePauw

Laura B. Bryan

From: CPCINFO
Sent: Monday, May 8, 2023 9:04 AM
To: Ava Monnet
Subject: Fw: Commercial Short Term Rentals

From: Joanne Drummond <joandrum@yahoo.com>
Sent: Saturday, May 6, 2023 1:19 AM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Commercial Short Term Rentals

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Hello,

As a French Quarter property owner who has experienced the negative effects of short term rentals first-hand, I oppose any expansion of short term rentals.
1. New Orleans is experiencing a housing crisis due to the shrinking inventory and higher prices of long term housing due to the investors seeking to maximize their profits through short term rentals.
2. With fewer permanent residents, crime has increased because neighbors are no longer there to look out for their community. Multiple people have been shot and killed at unsupervised parties held at short term rentals with no supervision.
3. Quality of life has declined because permanent residents have to put up with loud drunken tourists, trash and fewer parking spaces.
4. Short term rentals create issues regardless of whether they are owned by commercial entities or individuals.

It is time to prioritize the interests of residents. Please rein in the short term rentals.

Sincerely,
Joanne Drummond

Fw: Keep the existing commercial short term rentals (with full enforcement)

Rachael Berg
Tue 5/9/2023 10:36 AM
To: Rachael Berg <rberg@nola.gov>

From: Robert D. Rivers <rdrivers@nola.gov>
Sent: Tuesday, May 9, 2023 9:41 AM
To: Rachael Berg <rberg@nola.gov>
Subject: Fwd: Keep the existing commercial short term rentals (with full enforcement)

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From: Benjamin Saper <bensaper@advocatefor.me>
Sent: Monday, May 8, 2023 12:10:49 PM
To: Robert D. Rivers <rdrivers@nola.gov>
Subject: Keep the existing commercial short term rentals (with full enforcement)

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Hi Executive Director Bob Rivers,

Please leaving the existing rules governing commercial short term rentals in place and remove the prohibition on permits in HU-MU. These rules strike the right balance, assuming full enforcement. I am an immigration attorney at Catholic charities of New Orleans. With my life savings, I bought a damaged house zoned HU-MU in order to rent one side of the duplex to a long term tenant, and list the other as an STR. Only with the STR income would I be able to pay the mortgage. I researched carefully before buying that my house was zoned for STR, and I submitted an application upon closing, but the city changed the rules a day after I submitted the application. I feel like the ground has shifted under me and my future is in jeopardy. Please keep the 2019 commercial str rules and focus the attention where it is needed - enforcement!

Thank you for your time.

Sincerely,
Benjamin Saper

Fw: Welcoming guests is good for the economy

Rachael Berg
Tue 5/9/2023 10:36 AM
To: Rachael Berg <rberg@nola.gov>

From: Robert D. Rivers <rdrivers@nola.gov>
Sent: Tuesday, May 9, 2023 9:40 AM
To: Rachael Berg <rberg@nola.gov>
Subject: Fwd: Welcoming guests is good for the economy

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From: Jenny Lawson <jennyruth867@p2a.co>
Sent: Monday, May 8, 2023 12:10:49 PM
To: Robert D. Rivers <rdrivers@nola.gov>
Subject: Welcoming guests is good for the economy

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Hi Executive Director Bob Rivers,

[**DeleteAs a homeowner, a visitor to other cities, and an STR host, I ask that reasonable actions be taken to support New Orleans.

I currently pay an average of $800 per month to multiple persons living in New Orleans to assist me with managing my listing. I pay $40/week to a small lawn business to ensure that my property looks perfect for guests. My guests pay $120 to a local cleaner for 2-3 hours of work each time they visit. This is an incredibly livable wage, and also the typical hourly wage that STR owners are expected to pay for cleaning services in New Orleans. I paid over $8,000 in to multiple small businesses for upgrades, repairs, and landscaping to cosmetically increased the appeal of my home. I pay 15% of my income to taxes for this city. I clean the trash in a one block radius of my home every week. I have made friends with the drug house across from me. The guns are no longer visible and those to took too large a dose no

longer roll publicly on the street or stand on the corner yelling. I, and several others like me are investing a lot of time and money into our homes and our neighborhoods.

I have traveled within this country extensively. Whenever I travel, I search exclusively for Airbnb rentals. If none are available, I don't go to that location. As much as my generation complains about the impact of Airbnb, we do not use hotels. They are overpriced, do not allow us to travel in groups, and do not afford us an "authentic" experience in that location. If STRs are not available, this city's tourism will continue to decline. It already is. Between the national trend of increased international travel in response to pandemic repression and the crime waves that are pulling conferences out of New Orleans, we currently are becoming less desirable as a travel destination. A recession is on the horizon. Now is not the time to discourage tourism or remove well paying jobs from our economy.

I live in a flood x zone. Even so, my homeowner's insurance has increased by $400 per month this year. This change occurred without any major storms last year. This is likely a national trend that will continue to increase in severity for all coastal cities. Were I to rent out my home on the long term market, I and others like me would pass on the increased cost of insurance to renters. $2,350 per month for a two bedroom home is not an affordable living option, but that is the current cost of mortgage and insurance. This does not include the cost of repairs or upkeep. Removing STRs from the market is not a viable path to create affordable housing. The city and country must create their own plan. this line and add your message here.**]

Sincerely,
Jenny Lawson

Fw: Against B and Bs in the Quarter

Stephen K. Kroll
Wed 5/10/2023 11:25 AM

To: Valerie McMillan <Valerie.McMillan@nola.gov>
Cc: Rachael Berg <rberg@nola.gov>

I'm forwarding to Rachael. My assumption is that this has to do with the Commercial STR study because there's nothing else it could relate to.

From: Valerie McMillan <Valerie.McMillan@nola.gov>
Sent: Wednesday, May 10, 2023 11:19 AM
To: Stephen K. Kroll <skroll@nola.gov>
Subject: FW: Against B and Bs in the Quarter

Hey,

Do you know if this is for a particular docket?

-----Original Message-----
From: CPCINFO <CPCINFO@nola.gov>
Sent: Wednesday, May 10, 2023 11:19 AM
To: Valerie McMillan <Valerie.McMillan@nola.gov>
Subject: FW: Against B and Bs in the Quarter

-----Original Message-----
From: Ann Strub <anncoxstrub@icloud.com>
Sent: Wednesday, May 10, 2023 9:22 AM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Against B and Bs in the Quarter

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My family and I do not want more B and Bs in the French Quarter! Please do not allow this to happen!

Ann Cox Strub
529 Esplanade Avenue
New Orleans , LA 70116
Sent from my iPhone

Fw: No new STRs in the French Quarter

CPCINFO <CPCINFO@nola.gov>
Wed 5/10/2023 3:51 PM
To: Ava Monnet <Ava.Monnet@nola.gov>

From: Tatiana Jurzak <tatianajurzak@gmail.com>
Sent: Wednesday, May 10, 2023 1:23 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: No new STRs in the French Quarter

EMAIL FROM EXTERNAL SENDER: DO NOT click links, or open attachments, if sender is unknown, or the message seems suspicious in any way. DO NOT provide your user ID or password. If you believe that this is a phishing attempt, use the reporting tool in your Outlook to send this message to Security.

Dear City Planning Commission,

PLEASE do not allow any expansion of Short Term Rentals (STRs) in the French Quarter. Please uphold the 50+ year ban on STRs in the Quarter. You have to understand that ALL of the residents of the French Quarter are the backbone of what makes it an authentic functional neighborhood experience.

Please believe that the "Commercial" VCC-1, VCC-2 and "Entertainment" VCE zones of the French Quarter are full of residents and residential housing too. These are MIXED zones, not purely commercial or purely entertainment. (That is true and critically important for commercial zones throughout the city's historic neighborhoods, not just the Quarter.)
I personally have lived full time with my family for the last 17 years in VCC-2.

Even though I am surrounded by businesses, we have real residential neighbors and there is nothing "transient" about our neighborhood. I know every single person who lives and works on our block. Jewelers, milliners, bartenders and restaurant workers, museum directors and docents at HNOC, Mr. Jonas the security guard there who keeps our block nice. All of the folks at the Omni hotel across the street and the many art gallery dealers and retail workers. We all keep a close eye on each other and each other's property (even though most of us are renters.)

When the big restaurant behind my apartment had a gas leak in the middle of the night during the pandemic, I was the one who smelled it and called Entergy to come out in the night and find the leak and turn off the gas. When the restaurant owner called me in the morning to thank me he assured me an explosion from such a gas leak would have "leveled the whole block!" (Can you imagine!?)
Residents in mixed use commercial areas MATTER! We are here at night and keep an eye on things.

When we have a hurricane, our commercial neighbors call me to check in on their storefront to know what to expect when they come to open in the morning.

When there is a broken window late at night, I can call my commercial neighbors to let them know and give a hand with the plywood.

VCC-2 is a nice place to live and work, be an artist or musician and run a business.

In fact, because STRs are virtually banned in the French Quarter it is actually one of the more affordable places to live in the city. I know many people who are priced out of other neighborhoods because of STRs, and found more affordable housing in the French Quarter.

Allowing half of the French Quarter to be converted to STR will decimate what is remaining of the residential backbone of the French Quarter. The city has long held a standard that no rentals shorter than 60 days are allowed in the French Quarter. This standard is well founded and should not be abandoned for easy-money Airbnb greed from out of town property owners who will gobble up the properties the first chance they get.

The 60-day rental standard protects the housing for residents, it protects the huge investments of all of the hotels who offer legitimate, secure, staffed, regulated accommodations, up to code, for visitors and it protects the delicate historical buildings that make up the French Quarter, that can't stand up to the high turn-over that STRs are cranking through all over the rest of the city.

To date, the city is OBVIOUSLY unwilling/unable to regulate the illegal STRs that are all over the city right now. How can we expect the city to regulate the standard of safety required for STRs in the historic buildings too? The "frat boys" will be having bachelor parties turned death traps with a bunch of drunk, cheap tourists crammed into a 4th floor walk up, with no fire exit, by unscrupulous property managers/owners.

I beg you to protect the fabric of the French Quarter and not allow it to be abused any more than it already is.
No expansion of STRs in the French Quarter.

Thank you for your attention to this critical matter,
Tatiana Jurzak
511 Royal St.
New Orleans, LA 70130
504-722-9470

TO: City Planning Commission Staff
FROM: Jim Cook, Chair, Marriott Business Council of New Orleans
DATE: July 3, 2023
RE: *Transient Lodging Study—Defining Hotels*

Marriott International through the Marriott Business Council of New Orleans has a portfolio of 24 Marriott Branded hotels operating in Orleans Parish/City of New Orleans. We are engaged with a coalition of hospitality industry representatives to offer thoughts on the need for a clear definition of "Hotel" in the City's Comprehensive Zoning Ordinance. We thank the Planning Commission for taking the time to conduct a study of not only Commercial Short-Term Rentals, but all transient lodging uses.

Short Term Rentals Operating Under the Guise of Hotels

In July of 2018, Safety and Permits published a zoning interpretation memo that clarified the definition of "Hotel" to specify that hotels must include "1) dedicated lobby space to adequately enable check-in/check-out procedures, and 2) personnel/staffing to assist guests at check-in/check-out." (Zoning Memorandum Z-18-02) While this advisement is provided by the department's memorandum, this specific language-- and language further delineating the differences between Commercial STRs and hotels-- should be included in the CZO to avoid any ambiguity in the law. Unfortunately, operators are securing hotel licenses to operate where CSTRs are not allowed and at a greater number of units on properties without proper staffing, particularly without 24-7 front desk or lobby personnel. This proliferation of short term rentals has a detrimental impact on employment, particularly the availability of jobs in hospitality, because hotels create thousands of jobs while STRs do not. This proliferation is also detrimental to the safety of guests and surrounding communities. The proper staffing of hotels provides eyes and ears, which serve as a mechanism to promote safety and deter wrongdoing.

In echoing the language provided by Zoning Memorandum Z-18-02, we believe the definition of "Hotel" in the Comprehensive Zoning Ordinance should be as follows: (proposed new language in italics, along with existing language)

> *"An establishment providing customary lodging services, with a minimum of ten (10) units, regardless of the number of bedrooms in each unit, provided that each unit contain a minimum of one (1) bathroom. A hotel must provide on-site personnel at all hours (24 hours/7 days a week) in a dedicated lobby, front desk, or other space for conducting check-in and check-out procedures.*
>
> Related ancillary uses may include, but are not limited to conference and meeting rooms, restaurants, sale of convenience items, bars, and recreational facilities. Hotels shall be permitted to include units for sale designed or used exclusively for permanent residential use in all districts except in Light Industrial (LI), Heavy Industrial (HI), and Business Industrial Park (BIP) districts."

Likewise, relevant regulations should be clear in ensuring that all hotel operators are subject to the same fire code and building standards, proper rules, taxation, and oversight. It is imperative that

commercial uses be held to commercial standards. For this reason, we believe a “change of use inspection” should be required before any commercial short term rental permit or hotel license is issued to ensure compliance with commercial standards where required. We strongly believe that unambiguous language in the CZO for hotels, along with proper inspection, is a starting point for eliminating “bad actors” who are using hotel licenses as a back door to operate in areas where CSTRs are not allowed and to operate with greater density.

Our hoteliers are available to discuss any of the issues above in an effort to assist the Planning Commission in its efforts on this issue.

Louisiana Fair Housing Action Center (LaFHAC) Commercial Short-Term Rental Policy Platform 7/3/23

Rationale

For the Louisiana Fair Housing Action Center (LaFHAC), the regulation of short-term rentals (STRs) has always been primarily driven by our commitment to fight displacement and segregation. Jane Place Neighborhood Sustainability Initiative's 2018 *Short Term Rentals, Long Term Impacts* report[1] and the past Market Value Analysis[2] have made it clear that the proliferation of STRs have contributed to the hollowing out of many historically-Black neighborhoods and helped supercharge gentrification.

Our concerns about commercial short-term rentals (CSTRs) are similar to those about residential STRs, because so many mixed-use areas, where CSTRs are allowed, are actually a part of neighborhoods and contain homes for thousands of our residents. Therefore, regulating CSTRs is still about preventing displacement, eviction, removal of units from the market, and the rising cost of housing.

The difference with CSTRs is that their owners and investors are far more likely to be out-of-town bad actors, like Stayloom/Heirloom, those owners have even more money to spend, and CSTRs are so enormously profitable that they are beginning to displace all other commercial uses. The former Brown's Dairy site is the perfect example. It's premium land, close to the CBD and St. Charles Ave., that could have been developed into restaurants, retail, apartments, condos, or many other uses, but much of it is now giant three-story Airbnb party houses. The CPC and City Council need to start operating from the premise that if they allow CSTRs by-right and without conditions, that is all that will be developed in those zones because they're so profitable. In this way, CSTRs are akin to t-shirt shops in the French Quarter. The recommendations below are intended to disrupt this practice and leverage CSTRs to help solve our affordability crisis.

Recommendations

1. Limit CSTRS to affordable housing developments. The city's Comprehensive Zoning Ordinance (CZO) already contains density and parking bonuses if a developer is willing to build a percentage of affordable units, and a CEA with Finance New Orleans also entitles most developers to a property tax break. Those developers should be able to receive a similar number of CSTR permits as an additional incentive to help subsidize the affordable units.
    a. As an example, a 20 unit building where 10% of units (2 units) must be affordable, should also be eligible for 2 CSTR permits.

---

[1] *Short-Term Rentals, Long-Term Impacts: The Corrosion of Housing Access and Affordability in New Orleans*. Jane Place Neighborhood Sustainability Initiative. 2018. Available: https://jpnsi.org/short-term-rentals.

[2] *New Orleans – Market Value Analysis*. The Reinvestment Fund. 2018. Available: https://noraworks.org/impact/#mva.

b. Developers who choose to hold more than 10% of units affordable should be eligible for additional CSTR licenses on a one-for-one basis, with a cap at 25% of the units being CSTRs. The cap is important because if we allowed buildings that were 50% CSTRs and 50% affordable, a negligent developer may ignore property management of the CSTRs because their long-term tenants have little power to find other housing.
c. 1-4 unit buildings will utilize the Small Multi-family Affordable Housing standards
d. 5-9 unit buildings should also be eligible for CSTR permits, if they hold the requisite number of units affordable (at least one and up to 25%).
e. 10+ unit buildings will utilize MIZ, VIZ, or AHPD standards.
f. Consistent with our existing inclusionary zoning regulations, CSTR units in these developments should be similar in size and bedroom number to the affordable and market rate units, with a cap on number of bedrooms in CSTR units at three. This will preserve the quality of life for long-term tenants in the building.
g. If CPC staff deem it necessary to protect the long-term tenants in a building, it may make sense to allow STR units in these buildings to utilize separate entrances, to cluster STR units in a certain part of the building, or to restrict STR guests from certain amenities. In no way should these rules put residents of the affordable units at any disadvantage.
h. By only allowing CSTRs in these affordable developments, there will be more city oversight that reduces the potential for illegal STR units. Developers and owners of inclusionary developments are already required to interact with Safety and Permits and the Office of Community Development on a regular basis.
i. Our new enforcement ordinance also creates a new additional threat that if an owner is caught renting more units as CSTRs than they have permits for, they will lose the ability to rent any unit on the property as an STR for five years. They will still be held to the affordability restrictions though.

2. To ensure CSTRs don't exploit loopholes in these regulations by posing as traditional bed and breakfasts or hotels/motels, or hostels, we should:
    a. Change the zoning and use standards for new Accessory and Principal BnBs in all commercial zones to ensure new BnBs are not permitted in city blocks that already have a BnB, NSTR, or CSTR.
    b. Accessory and Principal BnB use standards should also change to ensure no room advertised or rented in a BnB can sleep more than four people.
    c. Prohibit hostels outside the CBD districts, require 24-hour onsite management, and prohibit advertising or renting the entire space to one party.
    d. Amend the definition of hotel/motel to:
        i. Require 24-hour on-site management.
        ii. Ensure that units in a hotel/motel/hostel cannot be owned by individuals as condos.
        iii. To include a minimum of 10 units. Anything smaller should seek a BnB license.

3. Commercial STR licenses should also require all natural persons affiliated with the ownership of the property to be listed so the City can better track out-of-state bad actors.
4. Like STRs in residential areas, CSTRs should be a temporary use.

Brennan J Walters

From: Julie Jones <jjones1@uno.edu>
Sent: Monday, July 3, 2023 3:52 PM
To: CPCINFO
Subject: Message related to the July 11th hearing on CSTRs

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To the Commission and Staff of the CPC

I am writing at the behest of the board of Neighbors First for Bywater to urge you to limit CSTRs to districts where hotels are allowed. We are thinking particularly of Marigny, Bywater and Treme, where HMC-1 prohibits hotels; however, this limitation is applicable to many other neighborhoods where the business districts are in close proximity to the residential areas. Intense use of the kind represented by CSTRs in areas bordering residential zones would make life miserable for residents and also deprive them of the neighborhood serving businesses that are important to a sense of community.

Thank you for your attention.

Julie Jones, President

Neighbors First for Bywater

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Re: Fw: CSTR permit

Allison Hartdegen <allison.hartdegen@gmail.com>

Mon 7/10/2023 3:46 PM

To:CPCINFO <CPCINFO@nola.gov>

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I was advised by Airbnb to reach out in reference to a CSTR meeting happening tomorrow (to review future permit availability/regulations). I don't know what your office's term for "zoning docket" means but I would like them to continue to allow whole home rentals under CSTR permits.

Hope that's helpful, thank you.
Allison Hartdegen

On Mon, Jul 10, 2023 at 3:25 PM CPCINFO <CPCINFO@nola.gov> wrote:

> Hi Allison,
>
> Please give me more information so I know where to file your letter. Is this in support or opposition to a zoning docket?
>
> ---
>
> **From:** Allison Hartdegen <allison.hartdegen@gmail.com>
> **Sent:** Monday, July 10, 2023 2:08 PM
> **To:** CPCINFO <CPCINFO@nola.gov>
> **Subject:** CSTR permit
>
> **EMAIL FROM EXTERNAL SENDER: DO NOT click links, or open attachments, if sender is unknown, or the message seems suspicious in any way. DO NOT provide your user ID or password. If you believe that this is a phishing attempt, use the reporting tool in your Outlook to send this message to Security.**
>
> Good Afternoon,
>
> I am a lifelong resident of the New Orleans area, and I currently have a permit for a whole home CSTR which I have operated for many years now -- legally, with no complaints against me.
>
> My zone is mixed commercial use, and I have several bars, restaurants, businesses and offices within blocks of my CSTR. I know all of the neighbors and communicate with them regularly and still live very close by in mid city. My point being, that there is no impact to my neighbors who already have various "commercial" exposures within steps of their homes already.

> The constant attack on individuals using property they own for extra income in this city is very disappointing. I would not be able to obtain a "reasonable" rent at this location as a long term rental that would allow me to keep the property, pay a mortgage/taxes/ insurance etc.;
> without CSTR I would have to let the asset go, which I find quite disappointing as a single woman trying to build my finances up to a point where I can continue to live, and invest in my city and community in a meaningful way-- and hopefully retire here.
>
> I urge the council to realize that New Orleans residents are struggling to make ends meet and taking away supplemental income that the city is ALSO able to collect taxes on is
> extremely disruptive and ineffective in "protecting neighborhoods". The rent issues in this city are far and wide damaged by many other factors, although STRs seem to be the only issue constantly under fire because it is a good talking point for the council members to run with.
>
> Please review carefully, as many residents livelihoods truly depend on it.
> --
> Allison M Hartdegen

--
Allison M Hartdegen

CSTR - Commercial Short-Term Rental Regulations

K B <kathy.balbero@gmail.com>

Mon 7/10/2023 11:32 PM

To:CPCINFO <CPCINFO@nola.gov>
Cc:K B <kathy.balbero@gmail.com>;CLAUDIO C JR BALBERO <balberojr@bellsouth.net>

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July 10, 2023

Subject: CSTR - Commercial Short-Term Rental Regulations:
Residential Rental Property located in MU Zones

Property Location:
25574 Chef Menteur Highway
New Orleans, LA 70129

To: CPCInfo@NOLA.gov

Our small mom-and-pop real estate company, KAT-CLAU LLC, recently purchased a residential property in the Lake Saint Catherine neighborhood of New Orleans. We invested in New Orleans to use this property as a part-time personal vacation home and to generate rental income for our retirement via short-term rental permitting process in Orleans Parish. We were very diligent during our research of zoning, wetland permitting, environmental impact assessment, building permit requirements, and short-term rental requirements for property zoned M-MU (Maritime Mixed-Use District) prior to our purchase of 25574 Chef Menteur Highway in February 2022.

We have invested a lot of resources (both money and personal labor) to purchase and make improvements to this property based on posted rules on the City of New Orleans websites, and consultation with other short-term rental operators in Orleans parish. We liquidated an investment in Jefferson Parish to further invest in Orleans Parish.

I recently discovered that the City of New Orleans is accepting public comment regarding potential changes to the regulations related to Commercial Short-Term Rental permitting processes (CSTR).

I propose that residential property located within certain zoning districts, such as M-MU (Maritime Mixed-Use District), should be allowed to have a large penetration of CSTR permits, and should not have any requirement to be occupied by an owner or operator.

This M-MU Maritime Zone is well-suited for use as a vacation-home/resort area, with large lots and well-spaced single-family residential homes with private piers and boat docks, but interspersed with light industrial and

commercial uses such as marinas and seafood processing. There are at least 12 legally permitted CSTR's in the Lake Catherine area, which generate significant tax revenue and permit revenue for the City of New Orleans. These lake-front properties in Lake Catherine (as well as other M-MU zoned areas in the West End lakefront area) have a very low penetration of owner-occupied homes, as most are second vacation homes which are not occupied full-time. There have been no complaints in Lake Catherine for existing properties operated as STR's with existing CSTR permits. Many owners enjoy sharing their homes and Louisiana's Sportsmans Paradise with out-of-state visitors, as well as locals, who would otherwise not have the opportunity to fish and crab and kayak on beautiful Lake St. Catherine and Lake Pontchartrain.

All existing CSTR permits in M-MU zones for single-family residential property should be grand-fathered, with existing CSTR owner and operator permits renewed. A limit on the number of STR permits could be considered, but it should be a large number "per square mile" as there are no "blocks" in most M-MU zones.

I am a resident of the Bayou St. John area, and I certainly understand the neighborhood issues surrounding the proliferation of STR's in truly residential areas, especially historic neighborhoods. We are also the landlord for a traditional rental double shotgun, and I am supportive of strong limits of STR's in areas with residential zoning.

However, I am very supportive of residential whole-house STR's in certain commercial areas- with no requirement for an operator to occupy the property. Whole-house STR is a market that is appropriate for large families, for extended families, or for a group of friends to spend some time together in a more private environment than can be found in a hotel. Most of our bookings come from Vrbo (whole home only), with a few bookings from Airbnb.

The Lake Catherine neighborhood is outside of hurricane protection, and all buildings are elevated on pilings. Very few residences are occupied full-time due to the flood risks, and almost all properties are vacation homes occupied part-time by owners and/or renters. If not for the short-term rental opportunities, there would be a very high vacancy rate and dis-investment in this neighborhood, which would hurt the economics for both owners and for the City of New Orleans tax base. There are no neighbor concerns or complaints regarding STR’s in Lake Catherine since even full-time residents do not desire to be isolated and surrounded by vacant properties, and the properties are not ideal for the traditional rental market due to flood risks and elevation of structures.

I strongly urge the City of New Orleans to consider an exemption for properties located within M-MU zones for any tightening of regulations for CSTR owner and operator permits, and to grandfather existing CSTR permits in all commercial zones for single-family residential properties. especially in M-MU zones.

Sincerely,

Katherine Balbero
Manager/Owner of Kat-Clau, LLC

2811 Ursulines Ave.
New Orleans, LA 70119

504-905-4638
kathy.balbero@gmail.com

cc: Claudio C. Balbero, Jr.
Manager/Owner of Kat-Clau, LLC
balberojr@bellsouth.net

Please stop permits for ALL commercial STRS

Dionne Lane <babyroseuw@gmail.com>

Mon 7/10/2023 4:53 PM

To:CPCINFO <CPCINFO@nola.gov>;Freddie King <Freddie.King@nola.gov>
Cc:Eleanor S. Burke <esburke@nola.gov>;Dennis P. Murphy <Dennis.Murphy@nola.gov>;Allen Johnson <president@faubourgmarigny.org>;Margaret Walker <Margaretwalker214@yahoo.com>

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Hello,

I live in the 2100 block of N Rampart St. When my husband and I bought our home in 2014 it was a nice, quiet, historic residential street. All of the homes were single family homes filled with people who owned or rented them full time. Unfortunately, my block is zoned commercial (which doesn't really fit) and out of state investors have nearly single-handedly destroyed it. Saxony Holdings, LLC (which is connected to Cotton Holdings, LLC) owns 4 houses on my block out of 9. They also own many more houses around the city (including 1000 Elysian Fields, which is around the corner from my house) . There is another whole home STR that had a permit last I checked and another that has operated without a permit two times that I know of, for a total of 6 out of the 9 houses on my small block. I am surrounded by whole home STRs.

Saxony has committed multiple construction, HDLC and STR violations for years on house after house and has been allowed to continue with no consequences. One of the few times the owner was actually here, I was followed and harassed by him because I took a picture of his house from across the street. Add in Mags, which rents its rooms for $25 a night, attracting an endless parade of drug dealers and prostitutes and the problems with Iggys and The John, my neighborhood has been destroyed. Some nights it sounds like I live near a race track and other nights a shooting range. Saxony has applied for a permit to have 1000 Elysian Fields, 2118 and 2136 N Rampart St turned into a hotel. They also have permits to build two second buildings in the backyard of 2118 and 2112 (tearing down the back porch that my former neighbor overheard them laughing about that they didn't have a permit to build in the first place). I have only received one or two notices in the mail this entire time. I have seen so many friends and neighbors have to move out of the area because of the increasing crime and the cost of housing. My homeowner's insurance just went up to $7,700 a year. How much will a hotel across the street make my property taxes increase? I believe that people that live in their home should be allowed to STR part of their home or for part of the time, but there is NO appropriate place for Commercial STRS and hotels in former homes. Predatory, greedy out of state owners like Saxony have destroyed our quality of life and will take over if they can. I have contacted the city repeatedly and little has happened. I hope it is not too late for my block, but even if it is, please do not let this happen to the rest of the city.

Please put the people that live here first! Please ban commercial and whole home STRs permanently, and please do not allow single family homes to be turned into hotels. I want my neighbors and neighborhood back.

Thank you,
Dionne Lane

STR Meeting

Robert Schwartz <chetglo1995@yahoo.com>

Mon 7/10/2023 3:29 PM

To:CPCINFO <CPCINFO@nola.gov>

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Dear Staff,

Although I am unfortunately on work assignment out of town,
I am grateful to be able to write you regarding the situation with
STR properties.

It seems to me, respectfully, that the issue that is not being addressed,
is that while there are roughly 2,500 legal licenses out there, almost triple
the number of unlicensed Air B&B's are operating illegally. Most
people who have gone to the trouble, as I have, of doing things
the right way, are also compliant in making sure that our neighbors
and/ or in commercial properties, are not suffering in any way from our
business.

In many cases, it has become vital, with extraordinary increases in Insurance
and Utilities in the last two years, to earn money off our properties and
those who cannot be bothered to even apply for a proper license,
cannot expect to have any concerns about how their guests are
behaving towards others.

I feel the prudent thing is to crack down on the illegal behavior and
return the usage of STR back to those who adhere to the rules, rather
than take away from those who are operating in a safe and courteous
manor.

Most Sincerely,
Robert Schwartz,

Marin Stephens

From: CPCINFO
Sent: Tuesday, July 11, 2023 9:28 AM
To: Marin Stephens
Subject: FW: CSTRs in commercial zones - comment to Executive Director from STR owners

Marin Stephens (she, her, hers)
Senior Planner | New Orleans City Planning Commission
Office of Business and External Services
1300 Perdido Street, 7th Floor | New Orleans, LA 70112
(504) 658-2503 (office) | marin.stephens@nola.gov

From: Aimée K. Thomas <akthomas@loyno.edu>
Sent: Tuesday, July 11, 2023 8:50 AM
To: CPCINFO <CPCINFO@nola.gov>
Cc: Shannon Fortenberry <shannfortenberry@gmail.com>; Oliver M Thomas <Oliver.Thomas@nola.gov>
Subject: CSTRs in commercial zones - comment to Executive Director from STR owners

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Submission of comment from owners at 25514 Chef Menteur Hwy, NoLA 70129

Our STR property is in the Lake St. Catherine/NOLA area, a nine-mile island to the far east of downtown NOLA on HWY 90/Chef Menteur Hwy. It is approximately 30 minutes from downtown New Orleans. The island consists of fishing camps, marinas, and bait shops. There are no hotels or any other accommodations other than the handful of STR properties out there. The area is zoned Maritime Mixed Use.

As you make adjustments to better suit New Orleans and her citizens, please consider this lake community an exception to those new rules. Of the 12 (or so) STR camps, I know many of our neighbors have purchased these homes to enjoy with their families and to share with others through the STR market. This is important to consider because of the economic impact we make as local homeowners. We pay our taxes to the city and since we are currently legally licensed, also contribute additional taxes to the city through our STR platforms (Airbnb and VRBO). This rural community on the outskirts of NOLA is one way others can enjoy our Sportsman's Paradise of fishing, boating, and the lake life. If STR in commercial zones laws/rules negate this, the city will lose tax income and travelers will lose the access to this beautiful area. In addition, the local owners will lose the opportunity to enjoy this area as well.

We respectfully ask that this area not be lumped into the masses of inner-city properties struggling with the STR rules and regulations. If not for this handful of STRs in Lake St. Catherine we would not be able to host people from all over the country/world in this unique area of New Orleans.

Aimée Thomas & Shannon Fortenberry
25514 Chef Menteur Hwy

--

Aimée K. Thomas, Ph.D., Assistant Professor
Environment Program
Department of Biological Sciences
Loyola University New Orleans
6363 St. Charles Avenue, Box 25
New Orleans, LA 70118
E-mail. akthomas@loyno.edu
Visit our website. Tropicalnaturalhistory.org
Listen to our podcast @SoNatpodcast

Instagram @loyolaenvironment
Facebook @loyola environment program
Twitter @ loyolaENVA

Marin Stephens

From: Dionne Lane <babyroseuw@gmail.com>
Sent: Tuesday, July 11, 2023 11:13 AM
To: CPCINFO
Subject: Re: Please stop permits for ALL commercial STRS

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Thank you. I'm sorry, but I am not able to attend today because I am at work.
Dionne

On Tuesday, July 11, 2023, CPCINFO <CPCINFO@nola.gov> wrote:

received

From: Dionne Lane <babyroseuw@gmail.com>
Sent: Monday, July 10, 2023 4:53 PM
To: CPCINFO <CPCINFO@nola.gov>; Freddie King <Freddie.King@nola.gov>
Cc: Eleanor S. Burke <esburke@nola.gov>; Dennis P. Murphy <Dennis.Murphy@nola.gov>; Allen Johnson <president@faubourgmarigny.org>; Margaret Walker <Margaretwalker214@yahoo.com>
Subject: Please stop permits for ALL commercial STRS

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Hello,

I live in the 2100 block of N Rampart St. When my husband and I bought our home in 2014 it was a nice, quiet, historic residential street. All of the homes were single family homes filled with people who owned or rented them full time. Unfortunately, my block is zoned commercial (which doesn't really fit) and out of state investors have nearly single-handedly destroyed it. Saxony Holdings, LLC (which is connected to Cotton Holdings, LLC) owns 4 houses on my block out of 9. They also own many more houses around the city (including 1000 Elysian Fields, which is around the corner from my house) . There is another whole home STR that had a permit last I checked and another that has operated without a permit two times that I know of, for a total of 6 out of the 9 houses on my small block. I am surrounded by whole home STRs.

Saxony has committed multiple construction, HDLC and STR violations for years on house after house and has been allowed to continue with no consequences. One of the few times the owner was actually here, I was followed and harassed by him because I took a picture of his house from across the street. Add in Mags, which rents its rooms for $25 a night, attracting an endless parade of drug dealers and prostitutes and the problems with Iggys and The John, my neighborhood has been destroyed. Some nights it sounds like I live near a race track and other nights a shooting range. Saxony has applied for a permit to have 1000 Elysian Fields, 2118 and 2136 N Rampart St turned into a hotel. They also have permits to build two second buildings in the backyard of 2118 and 2112 (tearing down the back porch that my former neighbor overheard them laughing about that they didn't have a permit to build in the first place). I have only received one or two notices in the mail this entire time. I have seen so many friends and neighbors have to move out of the area because of the increasing crime and the cost of housing. My homeowner's insurance just went up to $7,700 a

year. How much will a hotel across the street make my property taxes increase? I believe that people that live in their home should be allowed to STR part of their home or for part of the time, but there is NO appropriate place for Commercial STRS and hotels in former homes. Predatory, greedy out of state owners like Saxony have destroyed our quality of life and will take over if they can. I have contacted the city repeatedly and little has happened. I hope it is not too late for my block, but even if it is, please do not let this happen to the rest of the city.

Please put the people that live here first! Please ban commercial and whole home STRs permanently, and please do not allow single family homes to be turned into hotels. I want my neighbors and neighborhood back.

Thank you,
Dionne Lane

Louisiana Landmarks Society

Pitot House • 1440 Moss Street • New Orleans, Louisiana 70119
Phone: 504-482-0312 • www.louisianalandmarks.org

July 11, 2023

New Orleans City Planning Commission
1300 Perdido Street
New Orleans, LA 70112

Re: Transient Housing Study

Dear City Planning Commission:

Louisiana Landmarks Society commends and supports the Transient Housing Study. It is our understanding that its purpose is to study the impacts, and recommend updated regulations of Commercial Short Term Rentals (CSTRs) and transient lodging uses. We would ask that the impacts include not only the effects on the availability of long term residential housing, but also the impacts on residential quality of life, on neighborhoods, and on the sense of community.

It is noted that hotels, motels, timeshares, hostels, and bed and breakfasts are to be included in the study. We would also encourage the inclusion of residential STR's, along with the rapid conversions of "Doubles to Dorms' – in order to get a complete picture of transient housing in the city. It would seem that the best and most forward thinking use of the city's resources is for the hired experts to study the whole picture, rather than just a piece – even if the next step is geared to CSTRs. The total data will prove valuable and useful – if not now, certainly in the near future.

We also ask that the study provide clear definitions and their requirements for each category, so the regulations can be proactive – rather than attempting to rely on enforcement after the fact. And we ask that any means to restrict conversions of long term residential properties into hotels, motels, STRs or any other transient housing be employed.

Thank you for the opportunity to submit comments on this important study. We look forward to further engagement.

Sincerely,

Sandra Stokes
Chair of Advocacy

From: CPCINFO
To: Katherine H. Polkinghorne
Subject: FW: CSTRs in Residential Zoned Blocks
Date: Tuesday, March 5, 2024 9:14:40 AM

From: Damon Nichols <damonln1983@gmail.com>
Sent: Tuesday, March 5, 2024 9:12 AM
To: Brannonew@gmail.com; Celeste A. Sparks <Celeste.Sparks@nola.gov>; Elizabeth D Holman <elizabeth.holman@nola.gov>; elliec2@yahoo.com; Helena N. Moreno <Helena.Moreno@nola.gov>; Jacquelyn Strohmeyer <Jacquelyn.Strohmeyer@nola.gov>; Jathibodaux@gmail.com; Jean-Paul Morrell <JP.Morrell@nola.gov>; Lesli Harris <Lesli.Harris@nola.gov>; Lisa Stutz <lisastutz@outlook.com>; Matthew C. Schoenberger <Matthew.Schoenberger@nola.gov>; Rachel J Kimble <Rachel.Kimble@nola.gov>; Sam Scofield <samscofield92@gmail.com>; Short Term Rental <STR@nola.gov>; Tony Koval <tk9077@gmail.com>; CPCINFO <CPCINFO@nola.gov>; glenn@ifsproducts.com; graphg@gmail.com
Subject: CSTRs in Residential Zoned Blocks

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Hello CPC Study,

Councilwoman Harris has asked my neighbors and me to submit comments and questions to be included in your CSTR report.

I implore the council members to also read through these as it will help shed light on why we are so outraged over this situation.

- Grandfathering CSTRs into residentially zoned blocks should be prohibited. Allowing these commercial CSTRs to operate in residential zones violates the fundamental principle of zoning and rezoning. This goes against everything the city has said they are working to stop, you are basically changing nothing and doing nothing by allowing these CSTRs to continue operating. There should be a reset to where they must abide by the laws dictated by that blocks zoning.
- Any property that is residentially zoned should be prohibited from having a commercial license (both retrospectively and prospectively). The property should have some commercial aspect (NOT be a single family home with no commercial space whatsoever).
- Single Family Homes should not be used in any capacity by LLCs (or other investors) as

full home CSTRs, especially in residentially zoned areas. As what has happened on our block, 3 bedroom homes are miraculously converted into 5 bedrooms to reach the highest occupancy limit. This is all in attempt to attract large groups for these party houses.

- Losses for allowing vacation rentals in our neighborhoods come in two categories; quality of life and long-term dollar losses in depreciation, which could run into the tens of thousands for individual property owners. CSTRs investors should not take priority over residents. The investment we put in our home is not worth less than that of the CSTR; which is how this situation is playing out. The city cares more about the CSTR than the needs of its residents. Our long-term losses will be realized in the reduced sale prices of single-family homes in proximity to short-term rentals. No one wants to live next to CSTRs!
- Short-term renters have no stake in our community, and therefore no reason to care how the neighborhood around them suffers from their loud disruptive behaviors. Zoning code laws keep hotels out of residential neighborhoods, and exist to accommodate the inevitable disruptions of tourism. Why are we allowing LLC's and investors to be immune to these zoning laws and basically allowing unsupervised mini hotel resorts directly next door to our homes?
- CSTRs also operate without paying taxes that would benefit the surrounding community.
- In our experience, no noise mitigation has taken place at all. We are met with hostile management companies when we voice our concerns or complaints. These investors collect their profits, but our loss of quiet enjoyment of our properties and destruction of our quality of life, is left without compensation. This is all at our expense! There are seemingly no consequences for CSTRs and they can do whatever they please.
- Our quality of life suffers when strangers occupy neighborhood homes for a few vacation days at a time. We hear those doors slam, the loud excited voices as they carry their luggage; How will these strangers conduct themselves? Will they maintain and respect the tranquility of our neighborhoods, or are they just here for a good time and don't care how loud or disruptive they are? Can you guess which of those they ultimately choose? Do you not understand what this does to our mental health?! This constant invasion of strangers next door, and the inevitable disruption they cause, is running our lives!
- Our homes are less than 6 feet apart. Cramming 10 people into a 3 bedroom single family home will always be a problem as 10 people drunk in the backyard is a party.
- Noise monitoring needs significant improvement. 70 decibels outside needs to be reduced for CSTRs in residential zoned blocks. This is our biggest problem. 10 people (usually more since no one is on property to regulate the party size) all together are loud. The noise may not consistently register as 70 decibels, but the loud drunken conversations, hooting and hollering, laughing, that continues for hours is a nuisance and

incredibly frustrating to deal with EVERY DAY.

- The city has only focused on residential STRs and completely ignored the fact that CSTRs are the biggest problem and offenders. This is why it's such a heartbreaking situation to hear that CSTRs are grandfathered into residentially zoned blocks. It seems like some investor has their hand in the city's pocket to be able to get away with this.

Re: CSTRs in Residential Zoned Blocks

Tony Koval <tk9077@gmail.com>

Fri 4/5/2024 2:42 PM

To:Damon Nichols <damonln1983@gmail.com>
Cc:Brannonew@gmail.com <Brannonew@gmail.com>;Celeste A. Sparks <Celeste.Sparks@nola.gov>;Elizabeth D Holman <elizabeth.holman@nola.gov>;Jathibodaux@gmail.com <Jathibodaux@gmail.com>;Katherine H. Polkinghorne <Katherine.Polkinghorne@nola.gov>;Lesli Harris <Lesli.Harris@nola.gov>;Lisa Stutz <lisastutz@outlook.com>;Matthew C. Schoenberger <Matthew.Schoenberger@nola.gov>;Rachael Berg <rberg@nola.gov>;Rachel J Kimble <Rachel.Kimble@nola.gov>;Sam Scofield <samscofield92@gmail.com>;Short Term Rental <STR@nola.gov>;elliec2@yahoo.com <elliec2@yahoo.com>;glenn@ifsproducts.com <glenn@ifsproducts.com>;graphg@gmail.com <graphg@gmail.com>;Ashley J. Becnel <ajbecnel@nola.gov>;CPCINFO <CPCINFO@nola.gov>

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Hi CPC Study,

I drafted this email about a month ago, but realized I never sent it. I wanted to add another request in addition to Damon's feedback to be included in the Transient Housing Study.

CSTRs should have an attendant that is on the property 24/7 for both security and neighborhood concerns. A section/room of the property needs to be carved out and reserved for that representative to monitor the property. That representative needs to be accessible by both the tourists staying there as well as neighbors. This is not dissimilar from having hosts and security in hotels.

Residential STRs are required to have someone be on property at all times, so Commercial STRs should have no exception.

One of many challenges in living next to one is that CSTRs are left completely unsupervised. There is no one available to tend to any issues, both from tourists and from neighbors. If there is a noise complaint or illegal activity happening, the process to report this is very convoluted. First off, with no one on property, the CSTR owners have literally no idea what is happening on the property. Therefore, if something is happening, neighbors have to take the time to report the issue. Neighbors have to call and report an issue to a management company, who in our experience, may or may not even answer. Then the management company will have to contact the tourists to tell them to stop. Again based on our experience, we often get to this step and the management company simply states "we can't reach them", and then nothing ever happens to rectify the situation.

If there's an attendant on property, then they would be able to catch any loud parties or illegal activity and immediately take action, without having to go through this roundabout, ineffective way to manage complaints.

This should be 100% a requirement for ALL STRs, regardless if it's Residential or Commercial.

Ultimately, many CSTRs owners are seemingly trying to operate as hotels without having to comply with any of the hotel regulations or hiring the appropriate staff to support. Further, CSTRs owners rely on neighbors to act as the enforcers instead of monitoring them themselves. This is such a terrible business model that truly only benefits these investors at the expense of the community.

Thank you for including this feedback into the Study. I am more than happy to expand on anything as well.

Thanks,
Tony

Tony Koval
tk9077@gmail.com
773.758.4843

On Tue, Mar 5, 2024 at 10:09 AM Tony Koval <tk9077@gmail.com> wrote:

> Hi City Council Representatives,
>
> Would it be unreasonable to ask the City that until this study can be completed and new laws are created for CSTRs, that the City puts a pause on approving any new CSTR permits and on renewing any existing CSTR permits? Then of course, enforcing that anyone without a valid permit cannot operate.
>
> That would be a minor win for the residents who are being and will continue to be terrorized by these CSTRs in the interim. I'm sure it will infuriate many outside investors, but wouldn't the point be to align with residents and not those investors?
>
> Thank you,
> Tony
>
> Tony Koval
> tk9077@gmail.com
> 773.758.4843
>
> On Tue, Mar 5, 2024 at 9:33 AM Damon Nichols <damonln1983@gmail.com> wrote:
>
> > Hi Councilwoman Harris,
> >
> > I have submitted my comments to a report that is not even active. When do we expect this to happen? How do we make this a priority?!
> >
> > Please understand that my anger and frustration is not directed at you, but at the situation we are forced to endure. This just feels like another slap in the face!
> >
> > On Tue, Mar 5, 2024 at 9:21 AM Katherine H. Polkinghorne <Katherine.Polkinghorne@nola.gov> wrote:

Good morning,

Thank you for reaching out to the CPC. The City is still in the process of selecting a consultant to conduct the Transient Housing Study, which will include research and recommendations on CSTRs as well as other lodging uses. I have received your comment and saved it to be shared with whichever consultant is selected.

Kaede Polkinghorne (she/they)

City Planner | New Orleans City Planning Commission

(504) 658-7023 | katherine.polkinghorne@nola.gov

Please be advised that all email correspondence is subject to the state's public records laws.

From: CPCINFO <CPCINFO@nola.gov>
Sent: Tuesday, March 5, 2024 9:15 AM
To: Katherine H. Polkinghorne <Katherine.Polkinghorne@nola.gov>
Subject: FW: CSTRs in Residential Zoned Blocks

From: Damon Nichols <damonln1983@gmail.com>
Sent: Tuesday, March 5, 2024 9:12 AM
To: Brannonew@gmail.com; Celeste A. Sparks <Celeste.Sparks@nola.gov>; Elizabeth D Holman <elizabeth.holman@nola.gov>; elliec2@yahoo.com; Helena N. Moreno <Helena.Moreno@nola.gov>; Jacquelyn Strohmeyer <Jacquelyn.Strohmeyer@nola.gov>; Jathibodaux@gmail.com; Jean-Paul Morrell <JP.Morrell@nola.gov>; Lesli Harris <Lesli.Harris@nola.gov>; Lisa Stutz <lisastutz@outlook.com>; Matthew C. Schoenberger <Matthew.Schoenberger@nola.gov>; Rachel J Kimble <Rachel.Kimble@nola.gov>; Sam Scofield <samscofield92@gmail.com>; Short Term Rental <STR@nola.gov>; Tony Koval <tk9077@gmail.com>; CPCINFO <CPCINFO@nola.gov>; glenn@ifsproducts.com; graphg@gmail.com
Subject: CSTRs in Residential Zoned Blocks

EMAIL FROM EXTERNAL SENDER: DO NOT click links, or open attachments, if sender is unknown, or the message seems suspicious in any way. DO NOT provide your user ID or password. If you believe that this is a phishing attempt, use the reporting tool in your Outlook to send this message to Security.

Hello CPC Study,

Councilwoman Harris has asked my neighbors and me to submit comments and questions to be included in your CSTR report.

I implore the council members to also read through these as it will help shed light on why we are so outraged over this situation.

- Grandfathering CSTRs into residentially zoned blocks should be prohibited. Allowing these commercial CSTRs to operate in residential zones violates the fundamental principle of zoning and rezoning. This goes against everything the city has said they are working to stop, you are basically changing nothing and doing nothing by allowing these CSTRs to continue operating. There should be a reset to where they must abide by the laws dictated by that blocks zoning.
- Any property that is residentially zoned should be prohibited from having a commercial license (both retrospectively and prospectively). The property should have some commercial aspect (NOT be a single family home with no commercial space whatsoever).
- Single Family Homes should not be used in any capacity by LLCs (or other investors) as full home CSTRs, especially in residentially zoned areas. As what has happened on our block, 3 bedroom homes are miraculously converted into 5 bedrooms to reach the highest occupancy limit. This is all in attempt to attract large groups for these party houses.
- Losses for allowing vacation rentals in our neighborhoods come in two categories; quality of life and long-term dollar losses in depreciation, which could run into the tens of thousands for individual property owners. CSTRs investors should not take priority over residents. The investment we put in our home is not worth less than that of the CSTR; which is how this situation is playing out. The city cares more about the CSTR than the needs of its residents. Our long-term losses will be realized in the reduced sale prices of single-family homes in proximity to short-term rentals. No one wants to live next to CSTRs!
- Short-term renters have no stake in our community, and therefore no reason to care how the neighborhood around them suffers from their loud disruptive behaviors. Zoning code laws keep hotels out of residential neighborhoods, and exist to accommodate the inevitable disruptions of tourism. Why are we allowing LLC's and investors to be immune to these zoning laws and basically allowing unsupervised mini hotel resorts directly next door to our homes?
- CSTRs also operate without paying taxes that would benefit the surrounding community.
- In our experience, no noise mitigation has taken place at all. We are met with hostile management companies when we voice our concerns or complaints. These investors collect their profits, but our loss of quiet enjoyment of our properties and destruction of our quality of life, is left without compensation. This is all at our expense! There are seemingly no consequences for CSTRs and they can do whatever they please.
- Our quality of life suffers when strangers occupy neighborhood homes for a few vacation days at a time. We hear those doors slam, the loud excited voices as they carry their luggage; How will these strangers conduct themselves? Will they maintain and respect the tranquility of our neighborhoods, or are they just here for a good time and don't care

how loud or disruptive they are? Can you guess which of those they ultimately choose? Do you not understand what this does to our mental health?! This constant invasion of strangers next door, and the inevitable disruption they cause, is running our lives!

- Our homes are less than 6 feet apart. Cramming 10 people into a 3 bedroom single family home will always be a problem as 10 people drunk in the backyard is a party.
- Noise monitoring needs significant improvement. 70 decibels outside needs to be reduced for CSTRs in residential zoned blocks. This is our biggest problem. 10 people (usually more since no one is on property to regulate the party size) all together are loud. The noise may not consistently register as 70 decibels, but the loud drunken conversations, hooting and hollering, laughing, that continues for hours is a nuisance and incredibly frustrating to deal with EVERY DAY.
- The city has only focused on residential STRs and completely ignored the fact that CSTRs are the biggest problem and offenders. This is why it's such a heartbreaking situation to hear that CSTRs are grandfathered into residentially zoned blocks. It seems like some investor has their hand in the city's pocket to be able to get away with this.

Laura B. Bryan

From: Eli Goodman <eligoodman76@yahoo.com>
Sent: Monday, March 17, 2025 9:47 AM
To: CPCINFO
Subject: 900 Bartholomew St. CSTR commentary - Transient Lodging Study

Hello,

My wife and I are the owners of 900 Bartholomew St. Unit 212, New Orleans, LA 70117, aka The Saxony, and are submitting feedback regarding the ongoing issues we have had for years at our building with STR renters.

We bought our condo in January 2020 as a primary home for my elderly mother and father as a safe/secure location for them, and since that time, the sheer number of disturbances, thefts, parties, and just general nuisances for the full time residents have been outrageous.

The fact of the matter is short term renters do not have any investment in the community and have no issue with trashing the place when it serves their purposes. A community of long term owners and renters are apt to treat their properties like home, not like a rented amusement park without care for those that live there on an ongoing basis.

Hotels are set up to handle this type of transient activity...they have 24 hour staff, security, insurance, and the like to police and support short term stays, but a condo building that is just trying to allow the full time residents a quiet and agreeable place to live simply is not set up to support this type of commercial arrangement.

STRs are a scourge on our city and I hope the committee takes action to protect the residents that live here long term.

If I could go back and undo the purchase I would, as it was not clear at all at that time that the developer intended to support the building via STR units, and even at that, the existing STR owners are not on site and have very little oversight as to what goes on at their rentals at any given time.

I implore the commission to fully ban STRs if possible within New Orleans, as it is nothing but downside for owners and the community.

Best,

Eli and Alexandra Goodman

March 18, 2025

To: CPC Executive Director
CPCINFO@NOLA.GOV

Re: Public Hearing on The Transient Lodging Study Preliminary Meeting
Tuesday, April 8, 2025

To Whom It May Concern,

As Homeowners in The Saxony building, 900 Bartholomew Street, New Orleans, LA, we have great concern regarding the Commercial Short-Term Rental (CSTR) situation being operated on the property. We invested in The Saxony believing that it was a residential building in our historic district but have discovered otherwise.

Albeit limited, our understanding of the current code is there are strict limits as to the number of CSTRs allowed. However, of the seventy-five residential units in this building, there are dozens of licensed and unlicensed CSTRs operating through various property management companies or individuals. Many have consistently operated without permits for years. Most do not have placards showing active permits or contacts for notification and remediation of Condo violations.

The CSTR renters are transients who host loud parties, create other nuisances, cause property damage, threaten residents when confronted with damage or Condo violations and they remain unaccountable. They have little respect for resident Homeowners or the building and treat the building as a cheap motel. The property is in a constant state of disrepair & filth, requiring endless cleaning and maintenance exceeding what should or would be normal. Rarely do Operator/Owner/Permit Holders take responsibility for the damage, and the other Saxony Owners are left to participate in paying for clean-up and/or repairs, which is a hardship. Since most CSTR Owners are not permanent residents, they do not experience these continuous disgusting practices.

Often the damage done by CSTR renters remains as is, which in time, will certainly make our property value decrease. In fact, we fear that the value has already begun to drop. All of this is unacceptable.

Safety and security are a major concern, as much or more than the property value decline. There is no way to track or police all this transient traffic in, out and around the building and property.

Despite our Saxony residents' complaints to the City's Department of Safety & Permits, our Council Member, the Police, and the Developer, the quality of life for Saxony residents continues to be substantially negatively impacted. We have no faith that the city can properly administer CSTRs or enforce any CSTR violations in a condominium building of this size.

We also bear witness to the City's loss of housing opportunities to potential new resident owners and long-term renters – those likely to value and contribute to our community – because of exploitation by CSTR owners and operators.

We believe the only solution is to BAN CSTR rentals in our building as well as in the historic Bywater District.

Point of fact, other historic areas of New Orleans have already imposed a ban on CSTRs after experiencing declining property values and quality of life.

Respectfully,

Mark & Gwen Pepe

Mark and Gwen Pepe
Saxony 506

March 18, 2025

To: CPC Executive Director
CPCINFO@NOLA.GOV

Re: Public Hearing on The Transient Lodging Study Preliminary Meeting
Tuesday, April 8, 2025

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Point of fact, other historic areas of New Orleans have already imposed a ban on CSTRs after experiencing declining property values and quality of life.

Respectfully,

Mark & Gwen Pepe

Mark and Gwen Pepe
Saxony 506

Sarah C King

From: Al Catalano <mr.alcat100@gmail.com>
Sent: Saturday, March 29, 2025 12:28 PM
To: CPCINFO
Subject: CSTR Public Comment

Dear Sirs,
I would like to take this opportunity to express my experience with CSTRS where I live and own: 900 Bartholomew Street, The Saxony. The building is a 75 unit condominium complex in Bywater with units that are both owned and occupied by residents and owned and operated as CSTRS. As a 72 year old senior my decision to purchase a unit was based on my being able to reside in what appeared to be a safe and secure residence and neighborhood. Unfortunately my experience has been the complete opposite. Without listing specific incidents, in general the following are the deficiencies that exist causing the problems that I have experienced:

- Lack of on site security personnel
- Lack of on site rental management
- Majority of units operating without city permits

These deficiencies have led to countless nuisance complaints at all times of the night, emergency calls to the fire department for unattended stoves setting off alarms and property being stolen and vandalized. To put it mildly, a living environment that has become intolerable.

In summation, this out of control CSTR situation has had a tremendous negative impact on my quality of life, to the point of impacting my emotional and mental wellbeing.

Thank you for the opportunity to express my experiences and feelings and I hope you take into consideration my comments when deciding the future of CSTRS in my neighborhood.

Sincerely,
Albert Catalano
900 Bartholomew Street
Unit 514

Haley H Webb

From: CPCINFO
Sent: Monday, March 31, 2025 10:54 AM
To: Sabine E. Lebailleux; Haley H Webb
Subject: FW: FOLLOWING the Transient Lodging Study [per City Council Motion M-23-247]

Importance: High

Haley Webb (she/her)
Senior Planner | New Orleans City Planning Commission Office of Business and External Services (OBES)
1300 Perdido Street, 7th Floor | New Orleans, LA 70112
504-658-2503 | haley.webb@nola.gov

RESOURCES:
FAQ
Application forms
Property Viewer (check the zoning of a property) Comprehensive Zoning Ordinance One Stop App

-----Original Message-----
From: sjohnson@townofcarrolltonwatch.org <sjohnson@townofcarrolltonwatch.org>
Sent: Monday, March 31, 2025 10:50 AM
To: CPCINFO <CPCINFO@nola.gov>
Cc: Stephen K. Kroll <skroll@nola.gov>
Subject: FOLLOWING the Transient Lodging Study [per City Council Motion M-23-247]
Importance: High

Public comment to the CPC:

Residents will be closely following the CPC's Transient Lodging Study [per City Council Motion M-23-247] to ensure minimum negative impact on residential zoning and historic commercial districts from Transient Lodging uses.

Thanks,

Susan Johnson
Town of Carrollton Watch, LLC
2822 Lepage Street
New Orleans, La. 70119
https://protect2.fireeye.com/v1/url?k=31323334-501cfaeb-3132d9c6-454455535732-7c67a95c5e9dfb59&q=1&e=17c399d8-04a2-4a8e-b6f9-665cdaee9df4&u=http%3A%2F%2Fwww.townofcarrolltonwatch.org%2F

Bria A Dixon

From: Jay Seastrunk <jay.seastrunk@icloud.com>
Sent: Monday, March 31, 2025 2:34 PM
To: CPCINFO
Cc: Stephen K. Kroll
Subject: FOLLOWING the Transient Lodging Study [per City Council Motion M-23-247]

Public comment: residents will be following the CPC's Transient Lodging Study [per City Council Motion M-23-247] to ensure minimum negative impacts on residential zoning and historic commercial districts from Transient Lodging uses

Best Regards,

Jay Seastrunk
919 Henry Clay Avenue
New Orleans, LA 70118

Bria A Dixon

From: Keith Hardie <keithhardie@yahoo.com>
Sent: Monday, March 31, 2025 2:52 PM
To: CPCINFO
Cc: Stephen K. Kroll
Subject: Stop the Plague: Transient Lodging Destroys Housing Opportunity

The Transient Lodging Study must end the plague. Every new Short-term Rental, Bed & Breakfast, Double-to-Dorm or Hotel is a lost opportunity for residential housing. These parasitic conversions should be outlawed and strictly prosecuted. The poorly regulated tourism and transient housing industries have destroyed our housing market, pushed residents out in the streets, broken the peace in our neighborhoods, and increased rents and housing prices to the point that families have been separated, workers cannot find places to sleep, and the personal connections that constitute real multi-generational neighborhoods are broken. If you care about residents and the future of the City, you must stop the plague of greed.

Keith Hardie
keithhardie@yahoo.com

Haley H Webb

From: CPCINFO
Sent: Monday, March 31, 2025 9:25 AM
To: Sabine E. Lebailleux; Haley H Webb
Subject: FW: Transient lodging study preliminary meeting --comments for 4/8/25 hearing

From: Lyle Montgomery <lylemontgomery@gmail.com>
Sent: Sunday, March 30, 2025 11:18 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Transient lodging study preliminary meeting --comments for 4/8/25 hearing

My name is Lyle Montgomery and I have lived at 625 S. Rocheblave St since October 2017. At that time the neighborhood had a number of vacant lots, and a mix of residential and commercial properties. I expected that over time new homes and businesses would be built in the vacant lots, given its proximity to the new medical center, and overall central location.

I was taken aback by what happened. New houses started popping up in the vacant lots. But these were not houses designed for individuals, couples or families living in the city. These were houses designed for short term visitors, typically 4-5 bedrooms, 3-5 baths, with no yard. The first round of construction in 2019 resulted in 3 STR homes across the street from us, each 2 units with 5 bedrooms per unit, for a total of 30 STR bedrooms in 3 buildings. Since then 3 more STRs have been built on our block. At this point the approved STR units outnumber the long term residential units/homes on our block.

The same thing was happening beyond the 600 block of S. Rocheblave. Soon 10 new construction STRs covered one entire side of the 600 block of S. Tonti. Existing single family or multi-family homes were converted into STRs. Except for the 2424 Tulane apartments, every new residential construction project in our

neighborhood since we moved here in 2017 has been an STR. The old school on the corner of Gravier and S. Miro was beautifully restored, and then became multiple STRs.

The sheer number and density of STRs that the city has allowed has all but ruined this neighborhood. Instead of neighbors (whether a business or a residence) we have empty houses, where people come and go every few days. There is limited oversight by the property managers who are off site and may be responsible for managing many STRs. Overflowing trash carts are left out on the street all week, without any regard for the people who live here every day. Multiple complaints about the trash to the STR managers as well as the City produces no lasting improvement. Their multiple tenants frequently use up all the parking on the street or block permanent residents' property instead of using their designated off-street parking.

But my main complaint is that the sheer density of STRs prevents long-term residents and businesses from being able to locate here. Besides physically taking the space that would otherwise be available for long-term housing, the STR market has caused an escalation in property values, pricing lower income residents out of the city. Quality of life is diminished. It's not a vibrant place to live. A street lined with STRs feels like a ghost town.

At this point my mixed-use neighborhood is oversaturated with CSTRs and will probably not recover in my lifetime. I request that the City of New Orleans stop permitting these CSTRs. They provide little benefit and overall are damaging to the people and City of New Orleans.

Sincerely,

Lyle Montgomery

*I have attached two color coded maps below which demonstrate the proliferation and density of the STRs in my neighborhood (bounded by Tulane, Broad, Poydras, and Galvez) that occurred between 2017 and 2025.



2017



Bria A Dixon

From: Lynnette F Judge <lfjudge@cox.net>
Sent: Monday, March 31, 2025 2:54 PM
To: CPCINFO; Stephen K. Kroll
Subject: FOLLOWING the Transient Lodging Study [per City Council Motion M-23-247]

Please add my public comment to the record, asking that the CPC's Transient Lodging Study [per City Council Motion M-23-247] focus on ensuring minimum negative impacts on residential zoning and preserving historic commercial districts from Transient Lodging uses.

Sincerely,

Lynnette Judge

1512 Audubon St

New Orleans, LA 70118

University Neighborhood

Bria A Dixon

From: Mary MYSING-GUBALA <marygubala@bellsouth.net>
Sent: Monday, March 31, 2025 4:00 PM
To: CPCINFO
Cc: Stephen K. Kroll
Subject: FOLLOWING the Transient Lodging Study [per City Council Motion M-23-247]

To whom it may concern,

Residents will be following the CPC's Transient Lodging Study [per City Council Motion M-23-247] to ensure minimum negative impacts on residential zoning and historic commercial districts from Transient Lodging uses.

Sincerely,
Mary Mysing-Gubala, Ph.D.
319 S. Genois St.
New Orleans, La. 70119

Haley H Webb

From: CPCINFO
Sent: Monday, March 31, 2025 11:46 AM
To: Sabine E. Lebailleux; Haley H Webb
Subject: FW: FOLLOWING the Transient Lodging Study [per City Council Motion M-23-247]

From: Michael A Plemer, CPA <mplemercpa@aol.com>
Sent: Monday, March 31, 2025 11:24 AM
To: CPCINFO <CPCINFO@nola.gov>
Cc: Stephen K. Kroll <skroll@nola.gov>
Subject: FOLLOWING the Transient Lodging Study [per City Council Motion M-23-247]

Public comment: residents will be following the CPC's Transient Lodging Study [per City Council Motion M-23-247] to ensure minimum negative impacts on residential zoning and historic commercial districts from Transient Lodging uses.

Michael A Plemer
1405 Audubon St
NOLA 70118
504-488-1020

From: CPCINFO
To: Sarah C King
Subject: FW: CSTR Public Comment
Date: Monday, March 31, 2025 9:23:19 AM

Sarah C. King (she/her/hers)
Senior City Planner | New Orleans City Planning Commission
1300 Perdido Street, 7th Floor | New Orleans, LA 70112
(504) 658-7021 (office) | sarah.king@nola.gov

RESOURCES:
Application Forms
Property Viewer (check the zoning of a property)
Comprehensive Zoning Ordinance
One Stop App
Frequently Asked Questions
Short Term Rental Administration - Home - City of New Orleans (nola.gov)

-----Original Message-----
From: Al Catalano <mr.alcat100@gmail.com>
Sent: Saturday, March 29, 2025 12:28 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: CSTR Public Comment

Dear Sirs,
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Thank you for the opportunity to express my experiences and feelings and I hope you take into consideration my comments when deciding the future of CSTRS in my neighborhood.

Sincerely,
Albert Catalano
900 Bartholomew Street
Unit 514

Bria A Dixon

From: Tim Traycoff <ttraycoff@gmail.com>
Sent: Monday, March 31, 2025 3:47 PM
To: CPCINFO
Cc: Stephen K. Kroll; Susan Johnson
Subject: FOLLOWING the Transient Lodging Study [per City Council Motion M-23-247]

Public comment: residents will be following the CPC's Transient Lodging Study [per City Council Motion M-23-247] to ensure minimum negative impacts on residential zoning and historic commercial districts from Transient Lodging uses.

Tim Traycoff
3337 Nashville Ave, New Orleans, LA 70125

Outlook

Transient Housing Study

From Julie Jones <jjones1@uno.edu>
Date Tue 4/1/2025 10:25 AM
To CPCINFO <CPCINFO@nola.gov>

Greetings all,

I am writing on behalf of Neighbors First for Bywater to voice our feelings about transient housing in neighborhood business areas (HMC-1 and -2 for us). Many of these areas are immediately adjacent to residential housing and can make life a misery for permanent residents, so we want strict limitations on number. Most important, we want a mandate for ALL of these establishments to be staffed 24/7. This is to avoid the game, too often played, in which such a business can call itself a hotel when that's convenient and an STR when that's convenient. We want someone present at all times to deal with the disruptions endemic to such establishments.

Thank you for your attention.

With best wishes,

Julie Jones, President
Neighbors First for Bywater

NOTICE: This message, including all attachments transmitted with it, is intended solely for the use of the Addressee(s) and may contain information that is PRIVILEGED, CONFIDENTIAL, and/or EXEMPT FROM DISCLOSURE under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of the information contained herein is STRICTLY PROHIBITED. If you received this communication in error, please destroy all copies of the message, whether in electronic or hard copy format, as well as attachments and immediately contact the sender by replying to this email or contact the sender at the telephone numbers listed above. Thank you!

Outlook

Comment Re: CSTRs for CPC 2025 Transient Lodging Study

From Nancy Graham <nancyeg57@gmail.com>
Date Tue 4/1/2025 11:07 AM
To CPCINFO <CPCINFO@nola.gov>

To the Staff and Members of the City Planning Commission:

I am a permanent resident of New Orleans where I grew up in New Orleans East. I am now a current home owner in Bywater (since December 2020), a former home owner in uptown (3 + decades), and former City Attorney and Deputy City Attorney for New Orleans (responsible for land use/zoning advice and litigation). I have been active in neighborhood associations for most of my adult life (currently, e.g., as Board Member of Neighbors First for Bywater and founding member of an art project known as Salon Bywater).

During my years of engaged living in New Orleans I have observed and experienced degradation of our urban neighborhoods from transient lodging once tourism exploded. Most recently, I have experienced and continue to experience first-hand the negative impacts of Commercial Short Term Rentals ("CSTRs") on my Bywater south neighborhood and particularly my condominium building,The Saxony, which is positioned across Burgundy street from 10 vacation homes that are used exclusively as CSTRs. My years of first-hand experiences with CSTRs show patterns of neighborhood degradation associated with CSTRs, and have solidified my definitive opinion - my Bywater neighborhood is suffering a crisis not apparent to the casual observer because of CSTRs. CSTRs have caused numerous nuisances in my residential condo building, The Saxony (with 75 residential units plus 5 first floor mixed-use units). In The Saxony transient lodging traffic over the past 4+ years has been personally observed or confirmed to be linked to excess noise from parties at all hours, excess and unattended trash, damage to cars and building property, drug trafficking in the parking garage, prostitution in units, misuse of the stairwells for sex and drugs, use of stairwell exits to allow unknown individuals into the building, property thefts to the building and units because of stolen or reused CSTR codes, package theft in our common mailroom, threats to homeowners in all common areas, crimes such as drunken threats in the lobby and disputes among unknown persons requiring emergency calls to NOPD, and multiple gas exposure or fire threats requiring emergency responses of the Fire Department due to CSTR renters or cleaners leaving the units with the stove neglected and our inability to reach CSTR owners/operators). These negative experiences are in part attributable to years of the City's inept administration, which issued excess numbers of CSTR permits for The Saxony (at one point issuing at least 36 to the developer and other owners despite a 25 % limit), failed to respond to homeowner complaints about CSTRs, and failed to enforce reported and documented CSTR violations or even set them for hearings (with the exception of 1 in The Saxony to date). These negative experiences also are attributable to the developer's exploitation of the building - applying for and allowing excess CSTRs as units sold, allowing numerous CSTR operators to effectively run a boutique hotel without any accountability, single-point onsite management or adequate security, and controlling the ongoing exploitation by refusing to have an owner-driven HOA board. Compounding our negative CSTR-related experiences in The Saxony (which recently became particularly hazardous with a Fire Department response in one neglected CSTR unit) with similar experiences related to surrounding neighboring vacation homes fronting Burgundy, Alvar, and Bartholomew with a capacity for 100

vacationers, plus other nearby CSTRs (e.g., on Chartres and other pockets) our Bywater neighborhood suffers from disruption to our peace and quiet caused by excess noise from transient partying, and a lack of accountability for their CSTRs' trash, other nuisances, and property damage.

I convey these personal experiences in the hope that they will inform your study of transient lodging, particularly CSTRs. I urge you to consider the lack of necessity for CSTRs and our City's inability to properly administer or enforce the CSTR laws relative to condo or apartment buildings or "vacation homes". I urge you to consider, in contrast, our City's established hotel/motel industry and its ability to regulate and protect our transient lodgers and the public when absentee CSTR owners and operators cannot. When you consider our regulatory and land use options for transient lodging overall and the ongoing degradation caused by CSTRs to our historic neighborhoods, particularly Bywater, I urge you to propose a ban on CSTRs in all our City's historic neighborhoods. We want and need long-term neighbors in our residences, not lodgers.

Respectfully,

N. Eleanor Graham
900 Bartholomew St.
Condo 408
New Orleans, LA. 70117

Sent from my iPad

Outlook

upcoming CSTR discussion

From arney arney.org <arney@arney.org>
Date Wed 4/2/2025 12:29 PM
To CPCINFO <CPCINFO@nola.gov>

Dear City Council Members,

I urge you to consider the following in your April 8 meeting on CSTRs. As a Tulane graduate and passionate supporter of New Orleans, I have invested over $1 million in revitalizing blighted properties, transforming neighborhoods, and creating local jobs.

My permitted commercial short-term rentals provide housing for families visiting loved ones at the local medical center, and also for those relocating to New Orleans. My guests support small businesses beyond the tourist areas, and I exclusively hire local contractors—employing dozens of New Orleanians, from cleaners and plumbers to remodelers and roofers.

I have always followed city regulations, paid all required taxes, and never operated an illegal STR nor had a noise complaint. Restricting my CSTR permits would force me to take my investments elsewhere, slowing neighborhood revitalization and hurting local businesses.

Please allow me to continue contributing to the city I love.

Thank you for your time and consideration.

Michelle Arney

Outlook

My opinion on Commercial Short-term rentals

From Stephen Keighery <stephenkeighery@gmail.com>
Date Wed 4/2/2025 1:49 PM
To CPCINFO <CPCINFO@nola.gov>

I am a resident of Orleans Parish and I wanted to share my strong view that commercial properties should be able to do STRs. I own a 3 Plex on Louisiana Avenue that is zoned HU-MU and currently has 2 long tenants and one STR. As the zoning intended the area is "Mixed Use". I have a tailor on one side of me and an old Metro PCS next to me (currently abandoned but was going to be a Daiquiri Shop) and across the road is an abandoned gas station. On the blocks next to me you have a Keys, A Funeral Home, A beauty shop, an active gas station, a McDonalds and a Bank. There are also some multifamily houses. This is not zoned to be a residential area and having an STR is not damaging the fabric of the neighborhood (I am sympathetic to the case to restrict STRs in Residential areas).

Furthermore my property only exists because of the zoning giving it the right to be an STR. The previous owners bought it as a blighted property that was out of commerce. Everyone told them they should knock the house down but they decided to restore the property at great expense because they knew the house would be well received as an STR. The house now provides 2 long tenants a place to live as well as guests of our city a well managed STR. Restricting this activity in areas zoned for this will just mean more blighted properties.

I bought the house from them at a large expense because it was a licensed STR. If you do end up changing the rules I implore you to grandfather those of us who have made large investments based on the zoning laws that were in place. If you were to restrict my ability to operate the CSTR you will cause a large financial loss. For the record I don't live on the premises but I live 3 blocks from the property and I have a professional STR property manager that is available 24/7.

I hope you take all this information into consideration when you make your decision. If you want to talk on the phone my number is 504 372 9275.

Kind Regards

Stephen Keighery

Outlook

FW: Support CSTRs as a way to improve our city

From CPCINFO <CPCINFO@nola.gov>
Date Mon 4/7/2025 9:05 AM
To Sarah C King <Sarah.King@nola.gov>

Sarah C. King (she/her/hers)
Senior City Planner | New Orleans City Planning Commission
1300 Perdido Street, 7th Floor | New Orleans, LA 70112
(504) 658-7021 (office) | sarah.king@nola.gov

RESOURCES:
Application Forms
Property Viewer (check the zoning of a property)
Comprehensive Zoning Ordinance
One Stop App
Frequently Asked Questions
Short Term Rental Administration - Home - City of New Orleans (nola.gov)

From: christopher cochran <christopherfcochran@gmail.com>
Sent: Friday, April 4, 2025 5:15 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Support CSTRs as a way to improve our city

I would like this study to find out the amount of CSTR's that took blighted properties and vacant land and put them back into commerce: creating jobs, supporting other local businesses, and increasing the tax revenue of the city. This study should show City Council how CSTR'S are benefiting the city in all these areas, can be used to further help remove the overwhelming blight in this city, increase our revenue so we can pay our teachers and police officers a competitive wage, and make New Orleans a great place to raise our children.

Thank you for your time.

Chris Cochran
1801 N Rampart St
New Orleans LA 70116
(504)270-1119

Outlook

STR Ban in Residential Zones

From Angelique Theriot <atheriot72@gmail.com>
Date Mon 4/7/2025 12:30 PM
To CPCINFO <CPCINFO@nola.gov>

Hello,

I am a resident and homeowner in the Tulane neighborhood, and I support a total ban on STR units in residential zones citywide. Several houses operate on my block as full-time whole-home rentals without a permit. STR operators continue to demonstrate they will flout laws because they know there are no consequences. New Orleanians want neighbors and permanent housing availability, period. Visitors belong in hotels and not within residential areas creating nuisance. We also want stricter penalties and regular enforcement for those who choose to operate STRs outside current laws.

Thank you,

Angelique Theriot

Outlook

FW: STR Ban in Residential Zones

From CPCINFO <CPCINFO@nola.gov>
Date Tue 4/8/2025 10:10 AM
To Rachael Berg <rberg@nola.gov>

From: Brent Tranchina <brent.tranchina@gmail.com>
Sent: Tuesday, April 8, 2025 9:25 AM
To: CPCINFO <CPCINFO@nola.gov>
Subject: STR Ban in Residential Zones

Hello,

I am a resident and homeowner in the Tulane neighborhood, and I support a total ban on STR units in residential zones citywide. Several houses operate on my block as full-time whole-home rentals without a permit. STR operators continue to demonstrate they will flout laws because they know there are no consequences. New Orleanians want neighbors and permanent housing availability, period. Visitors belong in hotels and not within residential areas creating nuisance. We also want stricter penalties and regular enforcement for those who choose to operate STRs outside current laws.

Thank you,

Brent Tranchina

City Planning Commission Speaker Card

7

Date : 4/8/25

I would like to speak regarding CPC Docket : Item 7

INFORMATION ONLY

Name: Clark Gray

Address: PO Box 2197 Wimberley, TX 78676

○ I am the applicant for this docket

○ I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: _____

City Planning Commission Speaker Card

#7

Date : 4-8-25

I would like to speak regarding CPC Docket : TLS

IN SUPPORT

Name: Jon Lester

Address: 3027 Saint Philip St.

○ I am the applicant for this docket

○ I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: _____

City Planning Commission Speaker Card

#7

Date : April 8, 2025

I would like to speak regarding CPC Docket : Transient lodging Study Preliminary Report

INFORMATION ONLY

Name: Jeffery Wunder

Address: 1631 N Rocheblave

I am the applicant for this docket

I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: _____

City Planning Commission Speaker Card

Date : 4/8/25

I would like to speak regarding CPC Docket : 7

IN OPPOSITION

Name: Stephen Keighery

Address: 1724 Louisiana Ave, New Orleans

○ I am the applicant for this docket

○ I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: _____

City Planning Commission Speaker Card

7

Date : 04/08/2025

I would like to speak regarding CPC Docket : ITEM #7 - TRANSIENT LODGING STUDY

INFORMATION ONLY

Name: ELEANOR GRAHAM

Address: 900 BARTHOLOMEW ST

○ I am the applicant for this docket

○ I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: _____

City Planning Commission Speaker Card

7

Date : 4/8/25

I would like to speak regarding CPC Docket : Transient Lodging Study

INFORMATION ONLY

Name: Ro Logan

Address: 1000 S. Norman C. Francis

○ I am the applicant for this docket

○ I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☒ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: _____

City Planning Commission Speaker Card

Date : 4/8/25

I would like to speak regarding CPC Docket : TLS / #7

INFORMATION ONLY

Name: Angela Owczarek

Address: 2533 Columbus St 70119

○ I am the applicant for this docket

○ I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: _____

City Planning Commission Speaker Card

7

Date : 4/8/2025

I would like to speak regarding CPC Docket : Transient Lodging Study Prelim Report

INFORMATION ONLY

Name: Courtney Fricke

Address: 3833 Delachaise St NOLA 70125

○ I am the applicant for this docket

○ I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☒ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

X not receiving this

Signature of Speaker: Courtney Fricke

PUBLIC SPEAKING CARD FOR LAND USE MATTERS

(please print clearly)

Date: 4/8/25

Presiding Officer:

I would like to speak regarding Transient Lodging

☐ In Support ☐ In Opposition ☒ Info. Only

Name: Allen Johnson

Representing: FMIA

Address:: 1418 Chartres

#7

Remarks: Severely Limit Lodging in Marigny

(Please see speaker time rules on reverse of card)

Your signature required on the back hereof is certification that your statement is true and correct and an opportunity to acknowledge whether or not you have been compensated in exchange for your statement or attendance

Outlook

Comments on the CSTR Study

From Stephen Keighery <stephenkeighery@gmail.com>
Date Thu 4/10/2025 1:53 PM
To Land Use Study Distribution List <landuse@Desire-Line.com>
Cc CPCINFO@nola.gov <CPCINFO@nola.gov>

Some people who received this message don't often get email from stephenkeighery@gmail.com. Learn why this is important

Dear Desire Line team,

I attended the public meeting on Tuesday and was impressed by the work you're doing. However, I have one concern regarding the survey that I believe could significantly impact the accuracy of the results.

Specifically, I don't think the survey clearly communicates to respondents that CSTRs (Commercial Short-Term Rentals) can only be located on land zoned for commercial use. This distinction seems crucial because, when surveying people about their opinions on CSTRs in their neighborhoods, I believe many will not fully understand the zoning limitation. While you mention that residential STRs are not being addressed, the explanation that residential STRs are where someone lives on site and commercial areas are where they don't live onsite may inadvertently lead respondents to believe CSTRs are a greater concern to them than Residential STRs.

In reality, if someone lives in a residentially zoned area, they will not have a CSTR operating next door. Most of the arguments against STRs are due to them changing the fabric of residential neighborhoods (which I sympathize with) and I believe people will be against CSTRs for this reason, not understanding that the CSTRs can only be in commercially zoned locations. I believe this distinction could substantially influence how respondents answer the survey and, consequently, the results you receive.

I wanted to bring this to your attention as I think it's a material factor in ensuring the survey accurately reflects the community's views.

Thank you for considering this feedback, and I look forward to hearing your thoughts.

Kind Regards

Stephen Keighery
504 372 9275

From: Squarespace <form-submission@squarespace.info>
Sent: Wednesday, April 16, 2025 5:24 PM
To: Public Contact Email <contact@Desire-Line.com>
Subject: Form Submission - New Form 2 - Transient Lodging Study misnomer

Name: Bryan Duplechain

Email: brydup@gmail.com

Subject: Transient Lodging Study misnomer

Message: Right after the City Council's email regarding Desire Line's Transient Lodging Study was sent out, I received calls and text messages asking if I saw it. The knee jerk reaction was worry that the City Council had concocted a plan to force operators of CSTRs and Bed and Breakfast's to temporarily house homeless people and other "transients" - who live on the streets and sidewalks of our neighborhood - when necessary, like they do with the hotels in New York and other metros.

Some very reasonable people will default to the urban/common definition of "transient" and immediately think of the homeless. That's completely understandable in this context as homelessness is a huge problem in the Marigny and other French Quarter/Frenchman Street adjacent neighborhoods, which are also the areas where the most noise is made about the negative impact of STRs and Bed and Breakfasts.

Sure, if you read it, the website defines the survey's terms, but are people really gonna read ALL that information before they take the survey? It's very unlikely.

First, there's a ton of information to read through before you get to the definition section and the definition section is AFTER the first link to take the survey. And, if people follow instructions and use their phone's camera to scan the QR code (how else are they gonna scan it, right?), it's even more unlikely that they'll scroll through and read a miniaturized version of the website on a cell phone

browser.

So they'll take the survey thinking of homeless people instead of ordinary vacationers, business travelers and other paying visitors who contribute to our tourist economy, and Desire Line will collect a bunch of negative feedback because the people were responding to a totally different question.

Wait. Maybe that's the plan!

I mean, you don't really need the word "Transient" in a survey about vacation rentals and other temporary lodging, right?

Very, very, very clever.

I like it. Carry on.

Manage Submissions

Does this submission look like spam? Report it here.

Outlook

Additional Survey Thoughts

From Sam Levin <samlevin808@gmail.com>
Date Wed 4/16/2025 1:37 PM
To Land Use Study Distribution List <landuse@Desire-Line.com>

Some people who received this message don't often get email from samlevin808@gmail.com. Learn why this is important

Hey -

I recently filed out the New Orleans Transient Lodging survey, but did not have enough space in the write-in section to express all of my thoughts. Please see below:

Overall, my biggest wish is that this study is being approached with the mindset that we *want* New Orleans to be a leader in hospitality and tourism, and therefore we want to find a solution for transient lodging that supports the industry while maintaining (or even elevating) everything that makes the city great for residents. If regulations are too restrictive, then developers will go elsewhere and New Orleans will again fail to take advantage of an opportunity for growth.

There has been a tremendous amount of propaganda and misinformation about short term rentals over the past 7+ years. While I believe that public input on this topic is incredibly important, I hope experts such as yourselves can sift through it and compare it to actual data to draw conclusions and recommend solutions. For example, many residents do not understand the difference between a legal cSTR and an illegal nSTR (even if they think they do), and their answers to these questions may be clouded because of that. Also, some parts of the issue are easy to see and obvious (such as harder to find parking, or a group being loud at the STR pool next door), but some are harder to see or more abstract (increased tax revenue for the city, or a restaurant that is able to stay in business thanks to tourists). Please keep the hard to see and abstract in mind throughout this process and try to seek out data that can prove/disprove it and/or quantify it.

I also think it is important to discuss scale as well. If transient lodging development has resulted in a loss of long-term housing units, how does that compare to other forms of development? For example, how many housing units have been lost in the conversion of duplexes into single family residences?

How many vacant housing units exist in New Orleans?

How many blighted properties exist?

How many housing units would be created overnight if we legalized accessory dwelling units?

I understand the study is restricted to transient lodging, but its impact on long-term housing is part of that. And quantifying how big that impact is, by comparing it to the overall issue of long-term housing shortages in New Orleans, is a great way to do so.

PROPOSED TRANSIENT LODGING TYPES:
Since "STRs" are looking more like "hotels," and "hotels" are looking more like "STRs," we need better definitions of each (even City Council members have referred to projects as "hotels that act like STRs"). I think the best way to define/regulate transient lodging is by size. This would greatly reduce the number of transient lodging types (principal bed and breakfast, accessory bed and breakfast, non commercial str, commercial str, hotel/motel, timeshare, etc.) into 3 simple categories and minimize the loopholes developers have used in the past.:

Large could have any number of units/rooms/beds, but is restricted to only the most commercial areas of the city (downtown, commercial districts, MU-1, MU-2, HMC-1, HMC-2, etc). This is a commercial use that requires commercial building codes and sprinkler/fire alarms. These may require "customary lodging services," a lobby (sized based on the number of rooms), and staffing during certain hours (not 24/7). There could also be a requirement for a certain amount of affordable housing units to be built for a certain number of rooms (i.e. 1 affordable unit for every 50 transient lodging rooms).

Medium would also be a commercial use, but is limited to a certain size (perhaps 10 bedrooms, or 20 guests). They would be allowed in the same areas as Large, plus mixed-use zoning districts like HM-MU, HU-MU, HU-B1, and HU-B1A. Medium could require a lesser version of "customary lodging services" and lighter staffing due to their size. There could be a requirement to build 1 affordable unit OR 1 commercial unit (such as retail) for each project.

Small would be even further limited (perhaps 3-5 bedrooms) and could be built to residential building codes. Since it isn't required to have a sprinkler/fire alarm, it would require 24/7 staff on site when operating (like nSTR and BnB do). These could be allowed in all zoning districts but perhaps be restricted to one per block face to ensure neighborhood preservation.

Please note - these are not based on number of units, but instead number of bedrooms. A property with 5 one-bedroom units should be defined the same as a property with 1 five-bedroom unit (building codes may differ however).

SURVEY CONCERNS:
I believe that some of the questions in the survey were misleading and/or biased. For example, the question about rent prices leads people to believe that if their rent went up over the last few years (which is typical) it is due to the development of cSTRs, and not because of national inflation or out of control property insurance costs. Property values, typically the positive counterpoint to increased rents, are much more abstract and less well known, and therefore don't properly balance out the issue in the reader's mind.

Even the use of "walking distance" in your questions will add noise to the data. What someone considers "walking distance" is likely to differ based on how walkable (and mixed use) their neighborhood is. Or even how active they are, what their job is, etc.

The question about increasing cSTR taxes should also note the taxes that other transient lodging types pay (hotels, BnBs, etc) for a point of comparison. Reader's may even recommend an increase in taxes for hotels if they knew that they were paying significantly less than cSTRs.

ADDITIONAL THOUGHTS:
Conditional uses are a great example of restrictive policy that stops projects from happening. The concept is sound, but in reality the timelines are too long, the outcomes are too uncertain, and the rulings are too biased/influenced. Conditional uses make corruption (or at least the appearance of corruption) too easy and should not exist.

Parking requirements are another highly restrictive policy that, if changed, could spark development of all kinds. If parking is valuable and needed, it will get built. New Orleans can and should have a better public transit system, but decades of parking over-abundance have led to an underused and neglected system.

Thanks,
Sam Levin
610 416 4831

Metairie, LA 70002

www.desire-line.com

From: Pamela Atkins <atkinsp01@gmail.com>
Sent: Friday, May 16, 2025 5:04 PM
To: Kara Dudek-Mizel <Kara@Desire-Line.com>
Subject: Re: Thank You for Participating in Yesterday's Focus Group!

Hi Kara,

Thank you for this.

I just wanted to share some thoughts about the last question on economic impact that was raised in my breakout session. I am a small, legal CSTR owner and feedback that I receive from guests leads me to believe that the economic impact is material. My property is located in Esplanade Ridge, right by the Bayou Road corridor. Guest love to patronize the nearby businesses to get a better feel for the 'real' New Orleans. Separately, I support entrepreneurship as I employ a property manager, cleaners, repair people, and exterminator services. Also, as a non resident, I do not have a homestead exception so I pay full freight property taxes.

These issues may be obvious but I just want to make sure these aspects of CSTR are not lost. If there is anything else I can do to support your work, please let me know.

Best,

Pam Atkins

> On May 14, 2025, at 4:16 PM, Kara Dudek-Mizel <Kara@desire-line.com> wrote:
>
> Hello all,
> Thank you for taking the time to participate in yesterday's focus group to discuss Economic Development as part of the New Orleans Transient Lodging Study.
>
> *Attached you will find the presentation slides and meeting notes.*
>
> The remaining focus groups cover Permitted Uses and Nuisance Regulations **tomorrow, May 15th (online and in person),** and the Community Survey is open **through May 16th**. Please visit https://www.neworleanslodginganalysis.com/ for more information, and please help spread the word to your networks!
>
> Sincerely,
> Kara
>
> <image006.png>
> <image007.jpg>
>
> **Kara Dudek-Mizel, AICP**
> **Planner II, Grant Writer, Project Specialist at Desire Line**

Detailed response to invitation to submit Comments to Desire-Line, specifically addressing the feasibility of Commercial Short-Term Rentals in the French Quarter- May 15, 2025

By **Suzette Toledano**, 215-225 Decatur Street, who is a resident, homeowner exemption holder, intellectual property attorney, commercial real estate business owner, property owner, and lessor instrumental in the creation of VCE-1in 1992.

Contact: suzettetoledano@gmail.com, Office 504-525-2552 Ext. 3, Mobile 504-782-2552

I.

My request is for logic and common sense to prevail.

The French Quarter was the original City of New Orleans. It evolved to consist of distinct land areas designed to service human needs for: Housing, Lodging, Food and Drink, Entertainment, Retail, Manufacturing and Warehousing.

Today, various French Quarter stakeholders, standing for the same human needs, engage in hot debates over Short-Term Rental issues. Stakeholders include Residential property owners and lessees, Hoteliers, Restaurant and bar owners, Entertainers, Retailers, Manufacturers, Warehouse owners, Commercial and mixed-use property owners and the newcomers, Affordable housing advocates.

Each group of French Quarter stakeholders listed below prioritizes its own wants and needs, mandating that each group be uniquely examined to determine a proper balance for commercial short-term rental use in the French Quarter.

In evaluating the wants and needs of each group of stakeholders, it is noted that Lower Quarter stakeholder residents do not serve the tourism business, and they provide de minimis employment opportunities. On the other hand, the priorities of stakeholder businesses that serve the tourism business and create employment opportunities are vastly different. Businesses must operate profitably to survive.

VCPORA represents SOME, NOT ALL, homeowners and residents in the French Quarter. (VCPORA does not speak for me.) VCPORA prioritizes a community of "neighbors" in the traditional Mr. Rogers sense. It highly values an oasis of peace and quiet for restful living. As applicable to the residential zone areas of the Lower Quarter, its ideal deserves utmost respect.

VCPORA's stance against all short-term rentals in the French Quarter, both residential and commercial, is characterized by its "fear of creep." Meaning that VCPORA fears that if ANY commercial areas are permitted to host short-term rentals, then short-term rental permits will be eventually "creep" into residential areas.

The entire French Quarter was never meant to be a residential community. Common sense dictates that what is optimal in a residential zoned area cannot be applied uniformly to commercial, mixed-use and entertainment zoned areas. Regulating "creep" is a function of City

Planning and City Enforcement, it is not a function of VCPORA. VCPORA is not entitled to dictate land use to commercially zoned property owners, Similarly, commercial property owners have absolutely no business dictating land use to residential property owners.

HOTELS prioritize profit – but not simply profit. Hoteliers cherish the ideal of hotel room "compression" profit. While excellent hotels supply essential services, it is difficult to empathize with compression pricing. The aphorism, **"A rising tide lifts all boats,"** contemplates the ideal that an improved economy helps us all.

Hotels have long-received preferential treatment as the "Darlings" of the French Quarter. Hotels have advantages of (a) being subject to lesser rates of fees/taxes as compared to commercial short-term rentals that are excessively burdened; and (b) since 1969, hotels have operated as an oligopoly, dominating the lodging market courtesy of a government established moratorium on new hotels and expansion of existing hotels in the French Quarter. The 56-year-old moratorium was not designed to favor existing hotels. It was imposed to address a concern for density in the French Quarter.

(Ironically, when density waivers were sought by developers of vacant upper floors of commercial French Quarter buildings – density waivers were freely awarded, solving the underutilized vacant upper floors problem but resulting in a glut of apartment units that contribute to the apartment vacancies we are having today.)

Unlike hotel rooms, short-term rentals often have more than one bedroom and a kitchen. This makes short-term rentals ideal for the young family market - a market that French Quarter hotels cannot well-serve. Despite this, the hotel moratorium is used to preserve the oligopoly and to destroy all businesses that hotels perceive to be "competition." Hoteliers complain that their revenue per room with be driven down by competition from short-term rentals. Hotel owners are not the only property owners that are entitled to make a profit from their businesses. Their stance against all forms of short-term rentals, is driven by their "fear of competition." Regulating competition is a function of a free market, not hotels.

Meanwhile, a conversation with one of my favorite hoteliers reports that the hotel business is making good money once again. They have finally recovered from the pandemic.

MERCHANTS, defined as those with moveable property and services to "sell," including owners of restaurants/bars, entertainment venues, storefront retailers and manufacturers. The priority of Merchants is to make a profit. Merchants cannot use "compression pricing." For the most part, restaurant menu prices are printed and do not mysteriously rise with demand like airline ticket pricing. The marked price of retail items must be honored as tagged. Merchants are not known to oppose short-term rentals. Short-term rentals bring in more customers, resulting in increased profit.

LESSORS, defined as building owners of Commercial, Mixed-Use, and Entertainment Venues**,** i.e. those with immoveable property to "lease." Lessors must prioritize profit to maintain,

renovate, and insure their buildings, stay compliant with burdensome VCC guidelines, and keep their properties "in commerce" to support merchants, residents and tourism. As the co-owner of a specific mixed-use property at 215-225 Decatur Street, (entertainment venue, restaurant, bar, office, rental apartments and homestead-exempt residential condominiums), my opinion of commercial short-term rentals is positive. I will address our specific circumstances.

AFFORDABLE HOUSING ADVOCATES. Affordable rents in New Orleans range from $800 for a 1-bedroom unit to $1400 a month for a 2-bedroom unit. Advocates for affordable housing protest that owners of apartment properties are greedy. As will be further explained, the reality is the cost of monthly rent of a 2-bedroom 1600 square foot, 215-225 Decatur apartment in VCE-1 in 1997 was $2500, barely less than the cost of monthly rent in VCE-1 today.

I believe this was caused by the plethora of small apartment units developed in response to the City's call to utilize vacant upper floors of French Quarter properties post-Katrina. Density waivers were routinely granted to make these investments feasible. That and the depression of property values caused by the ban on short-term rentals in the French Quarter have resulted in the depression of rent predicament we are in now. Yet, despite the depression in rent, affordable housing advocates continue to blame short-term rentals for the lack of affordable housing. The high costs of staying VCC compliant, renovation, maintenance, and insurance for French Quarter properties makes it a certainty that apartments in VCE-1 will never qualify as affordable housing. Banning short-term rentals in VCE-1 won't do anything to increase the availability of affordable housing.

II.

The nature of the French Quarter as our original City mandates that each zoned area of the French Quarter be considered for land use on its own merits and as it affects adjacent properties.

The VCE-1 zoned live entertainment district consists of the 200-300 blocks of Decatur Street and only the lakeside of the 200-300 blocks of N. Peters Street. Its side streets are Iberville, Bienville, and Conti.

VCE-1 was created in 1992 when then City Councilmember, Jackie Clarkson, had a vision to bring back to life the seedy, vacant commercial warehouse district of the French Quarter. She wanted to enliven it with upscale entertainment venues to attract tourists. In early 1992, my family coincidentally purchased 215-225 Decatur with no knowledge of her plans for VCE-1, no knowledge of the House of Blues, and no concrete plans on how to develop the building. We ended up advocating beside Ms. Clarkson as we developed the House of Blues building.

215-225 Decatur is located in VCE-1. The anchor tenant of the first and second floors of the five-story building is an entertainment venue, the House of Blues, who operates a bar and a restaurant within. Above the House of Blues, in 1997, and with all good intentions to provide full-time residences, we invested heavily into the building and constructed eleven spacious luxury sound-attenuated large apartments with an abundance of closet space. Nine of the units are available to rent. They were fully rented, often as corporate apartments for many years until the oil bust. Two contiguous penthouse units are my home.

There are numerous problems that plague the French Quarter, However, the problems in VCE-1 are not caused by short-term rentals.

Most problems that challenge VCE-1 emanate from #DecaturIsGreater on social media. This hashtag results in "street scenes," pop-up congregations of locals in the street, some identified by undercover agents as gang members harboring grudges. The crowds of individuals hang out in the street. "Getaway" vehicles sporting dark tinted windows are illegally parked on the sidewalks, concealing weapons and narcotics. The crowds attract drug dealers. Party buses and showboat slingshot vehicles circle the block with stereos BLARING. The crowds blatantly disregard the NOPD. (With a noted exception for some ladies who are busy twerking on the hoods of the police units. I have witnessed this at least twice.) To be sure, many of the property owners in VCE-1 have been actively working with NOPD and Troop NOLA to correct this situation but it is taking a long time to undo the harm that continues to impose on the VCE-1's reputation.

Years of lack of permit enforcement of live entertainment noise regulations, bad actor operators of retail spaces, and bars masked as restaurants doubling as drug distribution centers, have plagued the VCE-1, leading to the disastrous, local public belief that the VCE-1 is a bad neighborhood and too noisy to live in.

As much as VCPORA and the Hotels want to demand that we only rent to long term residents, it is exceptionally difficult. There is rare demand for them. As it is, our rents have barely gone up 8% since 1997.

Can you imagine if the City told an owner of a luxury home in the Lower Quarter that despite being fully renovated, the home was not permitted to appreciate at all? Can you also imagine if a fully renovated luxury hotel room that costs $100 a night in 1997, was not able to raise its price more than 8% in 28 years, much less benefit from compression pricing? Odd, but perhaps this might be do-able if the costs of insurance, renovation, construction, maintenance and compliance remained at 1997 price levels, but that is simply impossible. Our insurance costs today are 430% higher than they were in 1997. VCPORA opponents of short-term rental accuse apartment owners of being greedy. That is not at all the case. We are merely trying to keep up. VCPORA and the Hotel lobby have prevented us from placing our units in active commerce. As much as we try, the on-going problems in the VCE-1 have informed the land use. There has been virtually no demand for long term luxury apartments in VCE-1 for over ten years.

For similar street crowding reasons, when the ban on French Quarter short-term rentals took effect years ago the 200-800 blocks of Bourbon Street were allowed to host short-term rentals, subject to no caps and no special restrictions. Except for names of the streets, the zoning text of VCE-1 is identical to that of VCE:

> Purpose: "To provide for entertainment places and restricted retail stores that attract and serve visitors and local residents."

Yet, in politically motivated deference to VCPORA and the HOTELS, the New Orleans City Council has thus far determined that the VCE-1 (consisting of 6 block faces) not be treated the same as the VCE (consisting of 16 block faces). From a land use perspective, it is not good policy to permit live entertainment -- one of the least restrictive uses -- and prohibit short-term

rentals. It defies common sense for an entertainment district such as VCE-1 to be treated differently than VCE.

Further inconsistencies belie common sense. Iberville Street is a service street boasting parking lots and loading docks. The Downtown Development District side of Iberville Street permits short-term rentals, yet the French Quarter side of Iberville Street does not. The former Chris Owens nightclub will be the Concrete Cowboy nightclub. It has a Bourbon Street address, whereas the multiple attached apartments behind the nightclub that historically use the 735 St. Louis Street and 727 St. Louis Street addresses will be permitted to be short-term rentals, yet apartments in the same block across St. Louis Street, and just as much affected by the noise on Bourbon Street, are not permitted be short-term rentals. In full disclosure, I have a 50% ownership interest in 710-714 St. Louis and 722-724 St. Louis. Recently, a musician tenant who was fully cautioned in advance about the noise levels, broke his lease, moving out due to the unregulated cacophony emanating from the nightclub located at 420 Bourbon Street.

I see no land use reason that all commercial zoned areas adjacent to Bourbon, Canal, and Iberville and the VCE-1 should not enjoy the same short-term rental privileges as those allowed on Bourbon Street, Canal Street, and Iberville Street. At a very minimum, VCE-1 should be permitted the same exact short-term rental privileges as VCE.

III.

In one of its studies, the City Planning Commission noted that second homes, if not rented on a short-term basis, will likely sit vacant for most of the year. Allowing for limited, deconcentrated short-term rentals in the French Quarter would activate under-utilized second homes while not taking long-term rentals off the market. I have even been told that a long-time member and officer of VCPORA publicly commented, on the record at the City Planning Commission meeting that called for this Transient Lodging Study, that the only proper location for a short-term rental is above a nightclub, proving that at least one ardent VCPORA proponent noted the possibility that VCE-1 is an appropriate zoned area to permit responsible short-term rentals.

There are few homestead-exempt owners in VCE-1. At my last count, I was one of two. The effect of short-term rentals on us will be no different than it was in the early 2000's when we leased corporate apartments to booming oil and gas companies. Corporate apartments are used to provide perks to customers and employees, so we often had guests in the building. If professionally managed, short-term rentals would be no different. We have a full-time property manager and maintenance person over all our French Quarter properties.

Apartment units in 215-225 Decatur are sound-attenuated and fully habitable. Yet the perception of the VCE-1 as being unsafe and noisy means that at 215-225 Decatur, demand is practically non-existent. We have been largely unable to rent our renovated luxury long-term apartments for the past ten years. We recently rented one of the units and the rent is less than $200 more per month than the monthly rent charged 28 years ago for the same unit, now newly renovated. The inflation calculator suggests the rents would have doubled by now to $5000 a month.

We respectfully request that our VCE-1 property at 215-225 Decatur Street become eligible to be permitted for short-term rentals without caps and restrictions just like the VCE. We hope to fully place it into commerce to enable us to generate sufficient funds to manage the challenges and costs we face. Please recommend to the City Council to allow properties located in the VCE-1 to play a part of the millions generated in fees and the beneficial economic impact of short-term rentals. Special interests and political campaign support have had a grip on the short-term rental ban in the French Quarter for far too long, resulting in years of lost opportunities for many.

In closing, thank you. I am delighted you have been asked to conduct this Transient Lodging Study and that you are open to change and compromise. Once upon a time there were inns, then came motels, then came hotels, then came bed and breakfasts, then came commercial short-term rentals. Time does not stand still. The "old" are always threatened by the "new." The old must adapt. Commercial short-term rentals are just one form of a new business enabled by the Internet. These new businesses serve New Orleans tourism, enhance the economy and pay taxes. Commercial short-term rentals are not unfair competition, they are just "new." Commercial short-term rentals deserve a level playing field.

This is an opportunity to recommend to the City Council common sense guidelines based on fact, not emotion and politics. Ideally, short-term rental guidelines will IDENTIFY AREAS where commercial short-term rentals will have no negative effect. Those areas can be part of the SOLUTION and relieve some of the pressure on the residential areas of the French Quarter, Marigny, Bywater and Treme. VCE-1 is intended to "serve visitors." We happen to believe TOURISM IS GOOD. New Orleanians love to share and our economy depends on it. VCE-1 is an appropriate place to permit responsible short-term rentals. Ghost tours, bicycle tours, music venues are all permitted to serve tourism. Apartment property owners in VCE-1 should be accorded the same privilege.

Many thanks for your consideration of my comments.

Suzette Toledano

Bob and larry,

I received the following feedback from someone, regarding the current Transient Commercial Lodging study. This person knows me, and therefore sent his input to me directly. would you please enter his comments into the record and ultimately the staff report, transmit to Desire Line as appropriate, and make sure that the staff members working on this receive his comments as well.

Robert M. Steeg

STEEGLAW

201 St. Charles Avenue | Suite 3201 | New Orleans, LA 70170

Office Tel: 504.582.1199 / Fax: 504.582.1240 / Cell: 504.875.6171

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From: Jeffrey Doussan Jr <doussan@kw.com>
Sent: Thursday, May 15, 2025 11:43 AM
To: Robert Steeg <rsteeg@steeglaw.com>
Subject: Fw: Community Survey Closing Friday, May 16th

Rob,

I completed the survey but was extremely disappointed in its construction. It seems really hard to claim this seeks citizen feedback on CSTR when a lot of the questions are impacted by someone's views of residential STRs. And no where does it ask about zoning where it is legally permitted. Here's a few examples showing bias in the survey language:

- **Regulatory Framing Bias**: The intro states the City is "working… to update regulations," implying policy change is already decided, which biases responses toward agreement.
- **Emotionally Loaded Language**: Questions focus heavily on negative impacts like "increase in evictions" and "loss of neighborhood character," without parallel emphasis on positive effects like increased tourism or local spending.
- **Bundled Policy Questions**: Complex proposals are combined into single questions—e.g., "require staff on-site full time, pass inspections, and follow fire codes"—forcing participants to generalize nuanced opinions.
- **Unbalanced Impact Presentation**: Negative impacts are detailed and numerous, while positive impacts are fewer and less specific, skewing perception.
- **Assumed Causality**: Questions like "Have you or someone you know been evicted from a unit that is now a CSTR?" imply direct causation without offering context or neutrality.
- **Forced Binary Choices**: Questions often limit responses to rigid options (e.g., permit/limit/prohibit), excluding conditional or situational viewpoints.

- **Primed Policy Direction**: The tone and structure make it appear that regulation is the logical outcome, rather than exploring a full range of perspectives.

I hope the small group interviews were a bit more neutrally facilitated than this survey.

Jeffrey

Jeffrey R. Doussan, Jr.
Operating Principal
KW New Orleans
M: 504.236.0222
doussan@kw.com
Licensed to Transact Real Estate in Louisiana

From: NOLA Transient Lodging Study <distribution@desire-line.com>
Sent: Wednesday, May 14, 2025 4:12:50 PM
To: doussan@kw.com <doussan@kw.com>
Subject: Community Survey Closing Friday, May 16th

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View this email in your browser

Outlook

Re: CSTR's

From Tara Lambeth <TaraLambeth@Desire-Line.com>
Date Thu 6/5/2025 2:21 PM
To Rachael Berg <rberg@nola.gov>

Received, thank you!

From: Rachael Berg <rberg@nola.gov>
Sent: Thursday, June 5, 2025 2:11 PM
To: Tara Lambeth <TaraLambeth@Desire-Line.com>
Subject: Fw: CSTR's

I think this is a comment for the Transient Lodging Study; see below. Thank you!!

From: CPCINFO <CPCINFO@nola.gov>
Sent: Thursday, June 5, 2025 10:28 AM
To: Ava Monnet <Ava.Monnet@nola.gov>
Subject: Fw: CSTR's

06/02 PM

From: Amy Connolly <awebbeking@gmail.com>
Sent: Monday, June 2, 2025 5:45 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: CSTR's

Dear City Councilmembers,

I am writing to urge you to deny future applications for CSTRs and repeal or rescind the 2016 and 2019 zoning ordinances allowing and regulating CSTRs. I live in the Bywater, near the CSTRs operated by Stay Heirloom rentals. Despite the Heirloom operators' attempts to placate us as neighbors, it is simply horrible living near them. Their guests are loud, leave trash around, block traffic on the two way thoroughfare Chartres St., cause dangerous traffic conditions on that same road when Uber and Lyft drivers are blocking lanes and a vision when they are picking up and dropping off their passengers. Each house has beds and can accommodate at least 16 guests (and likely many more). These houses are, by their nature, designed to be party houses. Each one has a pool in back which backs up to just one or two feet away from Ms. Alma's windows. She hears everything and feels like a piece of trash, not worthy of being respected. Ms. Alma has had to move her bedroom to the other side of the house due to the noise. The houses also look directly into her windows. It is just wrong. It is wrong to do that to a neighborhood with seniors, families with kids and really, just any neighborhood. My own family has a 13 year old who has heard the partying noises coming from the backyards of the Stay Heirloom houses for the past three years. We do not feel like we can feel comfortable in our own backyard as the Stay Heirloom houses located at 3513, 3517, 3521 are three stories high and look down on the backyards of all the houses around them. We feel not worthy of the City Council's respect. We are losing our home values, our privacy and in some cases, like Ms. Alma's, our very sanity. Please do something to repeal and rescind these awful ordinances and please make

sure that no other neighborhoods have to go through what we are going through. Thank you very much. Amy Connolly (625 Gallier St.)

Outlook

Re: PLEASE end CSTRs in our neighborhoods...

From Tara Lambeth <TaraLambeth@Desire-Line.com>
Date Wed 6/18/2025 8:36 AM
To Rachael Berg <rberg@nola.gov>

Received, thank you!

From: Rachael Berg <rberg@nola.gov>
Sent: Tuesday, June 17, 2025 5:57 PM
To: Tara Lambeth <TaraLambeth@Desire-Line.com>
Subject: Fw: PLEASE end CSTRs in our neighborhoods...

Tara,

Please see public comment below.

Thank you!

From: Stephen K. Kroll <skroll@nola.gov>
Sent: Tuesday, June 17, 2025 4:39 PM
To: Bria A Dixon <Bria.Dixon@nola.gov>; Cameron Boissiere <Cameron.Boissiere@nola.gov>; Rachael Berg <rberg@nola.gov>
Subject: Re: PLEASE end CSTRs in our neighborhoods...

It broadly relates to the transient lodging study. Rachael, where would you like the comment to go?

From: Bria A Dixon <Bria.Dixon@nola.gov>
Sent: Tuesday, June 17, 2025 4:22 PM
To: Stephen K. Kroll <skroll@nola.gov>; Cameron Boissiere <Cameron.Boissiere@nola.gov>
Subject: FW: PLEASE end CSTRs in our neighborhoods...

Good afternoon,

Can you please advise on where to send/how to document the comment below?

Best,

Bria Dixon *| She/Her/Hers*
Senior City Planner | *New Orleans City Planning Commission*
Office of Business and External Services
1300 Perdido Street, 7th Floor | *New Orleans, LA 70112*
(504) 658-7014 (office) | Bria.Dixon@nola.gov

From: Kourtney Keller <kourtneykeller@gmail.com>
Sent: Monday, June 16, 2025 3:13 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: PLEASE end CSTRs in our neighborhoods...

To whom it may concern...

You have heard from me before. I am tired and fed-up, as are our wonderful neighbors. CSTRs have demolished our neighborhood's quality of life and I can only imagine how many other neighborhoods... My neighbors and I have been (barely) enduring a 3 year battle with STAY HEIRLOOM, who have 3 CSTR properties on the corner of Chartres and Independence Streets in BYWATER. (3513, 3517, 3521 Chartres Street to be exact).

They (stay heirloom) give lip service to the meager ways that they will renovate their properties (basically small hotels) to make the perpetual party noise and visuals more tolerable, but NOTHING has changed.
The onus is still on us neighbors to CATCH THEM IN THE ACT OF PARTYING, which is ludicrous, exhausting and seemingly fruitless.

PLEASE HIRE MORE ENFORCERS!!!
DO NOT LET ANYMORE OF THEM OPERATE AND/OR SNEAK IN THROUGH ANY CRACKS IN ZONING. THEY DO NOT BELONG IN RESIDENTIAL AREAS, PERIOD.

Do not allow any other CSTRs to infect our neighborhoods. These corporations are NOY neighbors---they are selfish, prioritize MONEY-- FIRST AND ONLY, and could care less about the cultural/humanistic future of our city.

Stay Heirloom is a known entity. They make their employees sign NDA's.(wtf?) Their GREED is poison. I hope that any further legislation that is passed will STOP these kinds of monsters from destroying our wonderful city.

STRs are bad enough, without regulation...but CSTRs should have NEVER gotten a foothold to begin with. Regulation after the fact seems impossible.

Help.

-Kourtney M. Keller

(see below for a collection of prior emails/correspondence (in purple) regarding our struggles)

Dear neighbor,
Sent to: Sarah Seger of Stay Heirloom 5130 Tchoupitoulas St.

18 months ago this was a nice quiet neighborhood.
Then your hotels opened for business about a month ago and from day one it has been a nightmare of parties, noise, weed smoke, profanity, the sound of glass shattering in the night…We have a 9 year old son, Ms. Alma Taylor of 614 Congress is losing sleep and is at her wit's end. The cars parked the wrong way in the right of way on Chartres St (photos attached) are a safety hazard. Sarah Seger gave me the phone number of a security guard who works 8pm-3am Thursday-Saturday, but what of the parties on Monday night, like last night's soiree which went on past midnight? We have refrained from calling the number in the letter provided to our neighbor Sergio Alvarez of 613 Gallier, which he kindly passed along to us, because we thought this aggravation must be an aberration—surely there's no way this can continue? Last night we reached the end of our patience and

we called and talked to a machine. That we were not contacted by mail like Mr. Alvarez and Ms. Taylor is telling: are these the "good neighbor relations" espoused in the letter sent to Mr. Alvarez and Ms. Thompson? Our property is directly behind the back porches of these hotels, which is where most of the high times seem to occur, raised up on a platform so the party is literally in our faces.

Please provide me with documentation of the noise rules you say you have laid out for your guests, along with whatever other policies to which they are supposed to comply.

You need to enforce the noise rules.

You need to do something about the excessive trash.

You need to stress to your guests that parking on Chartres St. is not only very dangerous it is illegal.

BTW as of 11:03 am 11/21/23 cars were still parked illegally on Chartres St.

Thank you

--

Alex McMurray

www.alexmcmurray.com

Sent to jacquelyn.strohmeyer@nola.gov

Hello Jacquelyn,

My name is Kourtney M. Keller and my husband, Alex McMurray and I are reaching out to you on behalf of our own family and our many wonderful neighbors in Bywater. We live at 615 Gallier St. NOLA 70117.

Our good friend just had a productive and informative meeting with you regarding their in-home STR and suggested we contact you concerning some persistent problems we are having with a particular cluster of 3 commercial STRs that abut our yard and the houses/yards of several neighbors. Specifically, these properties are: 3513, 3517 and 3521 Chartres St. NOLA 70117, occupying the full corner of Chartres and Congress Streets in Bywater.

These 3 properties are managed by **Stay Heirloom**, (https://stayheirloom.com/) located at 5130 Tchoupitoulas Street, NOLA 70119. Each is a huge, 5-bedroom unit, with its own backyard pool, hot tub and the capacity to sleep at least 10 people per night which means that on any given night, over 30 people could be partying on our block and literally in many of our backyards. Essentially, this cluster of STRs operates like a loud, tourist hotel in our quiet neighborhood full of good, conscientious and hard-working people, kids and pets. Except this "hotel" has no on-site manager---no front desk. Every weekend is a party which causes excessive noise, garbage and parking problems for everyone living within radius. These properties and their unassuming guests are an unfair and frustrating hardship to our community. (see attached video taken from our back door.)

We need your help.

We have complained to Stay Heirloom's compliance #s and to the city government at https://nola.gov/report-an-str-violation/ several times concerning noise and parking, but to no avail.

How do we reclaim our quiet neighborhood?

What options might we have?

Stay Heirloom says that they don't allow their tourist guests to party, but this seems to be an unenforceable conceit.

These 2 bits of information might be helpful:

1. The properties have no contact or permit information publicly posted. They never have. (see 3 attached porch pictures)

2. Also, it appears that their licenses have all expired which might mean they cannot renew them under new jurisdiction? (Fingers crossed. See attached)

Please help us contact the right people and/or navigate the proper path towards stopping their destruction of our community. Any guidance is much appreciated.
We are at our wit's end.
Sincerely,
Kourtney M. Keller & Alex McMurray

SOME MORE HELPFUL INFORMATION:
STAY HEIRLOOM General Contact # (on website) : #504.507.0523
info@stayheirloom.com
Website: https://stayheirloom.com/
complaints: compliance@stayheirloom.com

Specific listing for all 3 properties on Stay Heirloom site:
https://book.stayheirloom.com/properties/65bc203dfcba9c002d49f9d2
Specific # listing for properties on AirBnB (where they are hosted by "Heirloom", not "Stay Heirloom"?):

https://www.airbnb.com/rooms/1084914592814191679

This is their posted registration # on AirBnB: 23-CSTR-01184, 22-OSTR-20810

Each property faces Chartres Street and has a specific address

1. Medium gray bldg. (closest to Gallier Street) - 3513 Chartres St.
2. Dark gray bldg. (middle) - 3517 Chartres St.
3. Light gray bldg. (closest to Congress St.) - 3521 Chartres St.

Hi,

I am writing to express concern about the short-term rentals down the block. I know we have to have photo evidence of the issues they're causing, so I downloaded the TimeStamp Camera app and took the attached photo of 3513 Chartres.

A frat house of 12+ boys checked in this afternoon, and I happened to be driving by. It would be great if anyone could do anything about all the noise coming from these three party houses. I work from home because I have a disability, and I can hear their pool parties/drunken screaming through my noise-cancelling headphones.

Please let me know if I should send this information elsewhere.

Thanks for anything you can do to help,
Sara Slaughter
626 Congress Street

To whom it may concern,

The pervasiveness of short term rentals throughout our city is deeply troubling. The economic formula is simple: STRs generate huge profits and so are irresistible to anyone with the capital to acquire property and convert it. Property values go up, along with taxes, and regular folks get squeezed out. Neighborhoods mutate into noisy enclaves filled with tourists and the bistros that cater to them. There is little incentive for landlords or property owners to provide rental property in the classic sense with all this free money out there for the asking. The only way, it seems to me, to rein in this type of thing is to implement the sort of regulations Neighbors First For Bywater have suggested to the City of New Orleans Planning Commission.

Our own house at 615 Gallier Street abuts a property on Chartres Street where for many years there was a warehouse. The owner of that property sold out to a developer (Bo Pennington of Pentek Homes) who tore down the warehouse and is currently building three three story STRs (photo attached). We realize there's not much we can do since the property is zoned commercial, but for the neighbors to have absolutely no say in this is dismaying. The first we heard of their plans for the property was when we received notification (attached) in the mail from the HDLC about a hearing, which arrived the day after the hearing. It saddens and hurts us to imagine a future with a stranger lording over our property from the balcony three stories above. A different stranger every 3 days or so. If these houses were occupied by people who lived there we would more than likely look forward to seeing them, as is true with all the rest of our neighbors.

We realize that the moneyed interests will probably win out in this, but we beg the CPC and the City Council to please consider the harm unregulated STRs are doing to our neighborhoods, our city and our culture. If we can't ban STR's citywide like in the French Quarter and the Garden District, then the kind of rules that NFB is recommending are essential.

Alex McMurray
Kourtney Keller
615 Gallier Street
New Orleans, LA 70117

The letter below outlines the position of the NFB:

City of New Orleans Planning Commission,

As new STR regulations are written Neighbors First for Bywater would like to suggest the following be applied to our historic neighborhood:

1. Require an on-site operator.

2. STR licenses for residential properties should be issued to persons only, not LLCs, and should be limited to one permit per property owner.

3. There should be a density cap of one STR permit per square.

4. Commercially zoned property (such as HMC-1) that abuts residential property should be required to adhere to the same regulations as residential property.

5. Along with the permit that is already required to be posted in clear view, there should be a clearly legible sign stating the number of rental units and maximum allowed occupancy, along with a phone number for STR enforcement that is answered 24 hours, seven days a week.

6. Any ONE verified licensing violation (not having a license, advertising more occupancy than allowed, allowing disruptive parties, etc..) should automatically result in a one year ban on the property. Licensing violations should be issued and resolved quickly, no waiting for a court date while neighbors continue to suffer.

7. A dedicated fee (percentage) per rental should be established that funds strictly STR enforcement. This would be in addition to the city tax already in place.

We also strongly support the current bans already enforced in the French Quarter and Garden District.

-------- Forwarded message ---------
From: **Christina L. Buie** <Christina.Buie@nola.gov>
Date: Mon, Dec 9, 2024 at 4:24 PM
Subject: 3517 and 3521 Chartres Adjudication 12.10.2024
To: Kourtney Keller <kourtneykeller@gmail.com>
CC: Aundra W Thompson <Aundra.Thompson@nola.gov>

Good Afternoon,

The properties are scheduled for Adjudication hearing on tomorrow at 10:00 am. The links are provided below, if you would like to attend virtually.

https://nola.webex.com/nola/j.php?MTID=mf3dd903b68b3e66c41b04cbf6dceab82

https://nola.webex.com/nola/j.php?MTID=mf3dd903b68b3e66c41b04cbf6dceab82

Sincerely,
Christina Buie
Code Inspector II
Safety and Permits
Office of Business and External Services | City of New Orleans
1340 Poydras Street | 8th Floor | New Orleans, LA 70112
(504) 658-7200 Office | (504) 658-7126 Direct | (504) 658-7211 Fax |
Christina.Buie@nola.gov

---------- Forwarded message ---------
From: **sara slaughter** <sara.slaughter@gmail.com>
Date: Tue, Dec 10, 2024 at 11:16 AM
Subject: Re: Fwd: 3517 and 3521 Chartres Adjudication 12.10.2024
To: Kourtney Keller <kourtneykeller@gmail.com>
CC: jc <johndog1net@yahoo.com>, Amy Connolly <awebbeking@gmail.com>, Sergio A Alvarez <seralval@gmail.com>

Hi all,
Below are my notes from the 10am adjudication this morning (12/10/24). The cliff's notes version:
1) The property owners were fined $2,125 for four violations from April 2024.
2) The property owners' attorney indicated that the property owners send staff members weekly to do "good neighbor checks" and file a report with the City each week.

3) The Short Term Rental Administrator (Celeste Sparks) said that property owners would be subject to $2k fines per violation and possible suspension of their rental license for any future violations.
4) The moderator asked that all complaints about any of the properties be added to the record for each of the properties because it's clear now that they're one big property with three separate rental units.
5) The moderator asked the city to monitor things more closely and the property owner to do a better job engaging with neighbors.

Kourtney and I both spoke on the record to attest to the properties' impact on our lives and neighborhood, as well as the fact that nothing has changed despite the property owners' "good neighbor checks," which don't seem to involve the neighbors at all. **It was clear to me that having neighbors show up to hearings is the only way to have concerns taken seriously.** Before Kourtney spoke, I don't think anyone in the room cared at all about anything other than getting out of the adjudication quickly.

Best,
Sara (626 Congress, always walking around the block with a long-haired dachshund and six-year-old daughter)

Case number: STR 24-036011-RENT
Violation at 3517 Chartres
The moderator didn't identify herself.
Sworn in virtually: Celeste Sparks (Short Term Rental Administrator, City of NO), Christina Buie (Code Enforcement Inspector), Sherri L. Hutton (City Attorney's Office)
Sworn in (in person): Graham Williams attorney appearing on behalf of 3517 Chartres St LLC
Others Present: Aundra Thompson, Rickey Smith, Kourtney Keller, Sara Slaughter

Graham Williams: We accept the settlement offer provided by the City of NOLA. Fines in the amount of $2,125. Ceasing rentals is not a term of the agreement.

Moderator: Can someone tell me what the quality of life issues are or what this case is about?

Sherri Hutton: I don't get to see anything and don't have a record. Has been in this job since 9/30. Get an email from an attorney, present whatever's being offered to Ms. Sparks. It's a money amount. Ms. Sparks provides a standard settlement offer back.

Sparks: 4 violations on the case. When we enter settlement, it's half of what hearing and violations would be. $2k is half. License got issued while case was initiated in April. At some point in time after notice of hearing was generated, license was issued on the property. Now they're in compliance. We were able to offer a settlement for this property as a result.

Moderator: How did you address quality of life issue? Make any kind of agreement with them? Only one quality of life violation on the property. Inspector Buie, can you speak to other issues or things that have been corrected while case was opened?

Buie: Submitted weekly good neighbor report with Ms. Emily. Asked her employees to do weekly checks.

Sparks: In the event that another case is opened, property at risk of using another license. Next case, violations will be addressed $2k per violation. Not eligible for settlement. Will be eligible to have license revoked. Future cases will be brought to adjudication. Violations will be $2k per violation.

Buie: I can confirm that evidence has been submitted for the cases. Only looking at 2 out of the 3 properties today, but there is substantial evidence for all properties.

Moderator: The city is hearing neighbors' concerns and trying to address them. I am asking the city to monitor things more closely and asking the property owners to engage with neighbors.

Graham Williams: For the property owner, "This is their highest priority in New Orleans."

Moderator: Please ask them to engage with neighbors, especially elderly.

Settlement read into record: $2,125 for 3517 Chartres St.

On Tue, Dec 10, 2024 at 9:50 AM sara slaughter <sara.slaughter@gmail.com> wrote:

Hey y'all,

I just signed into the Webex session, and it gave me the incident number. Here's what the first adjudication is about: https://onestopapp.nola.gov/SummaryContent.aspx?type=Code%20Incident&id=296363

Open Violations
CCNO 26-618(b)(1): Prohibited Acts - Advertising an Illegal Short Term Rental - Owner
CCNO 26-618(b)(11): Prohibited Acts - Quality of Life Issues - Owner
CCNO 26-615(a): Renting without a License
CCNO 26-618(b)(1): Prohibited Acts - Advertising an Illegal STR - Owner (Instance 2)

-SS

Outlook

Re: CSTRs

From Tara Lambeth <TaraLambeth@Desire-Line.com>
Date Wed 6/18/2025 2:15 PM
To Rachael Berg <rberg@nola.gov>

Received, thank you!

From: Rachael Berg <rberg@nola.gov>
Sent: Wednesday, June 18, 2025 1:49 PM
To: Tara Lambeth <TaraLambeth@Desire-Line.com>
Subject: Fw: CSTRs

Hi Tara,

Paul, my former supervisor and predecessor, sent me the e-mail below concerning CSTRs. I let him know I would forward to you for inclusion in the study.

Thank you!

From: Paul Cramer <paulcramerxxx@yahoo.com>
Sent: Wednesday, June 18, 2025 12:46 PM
To: Rachael Berg <rberg@nola.gov>
Subject: Re: CSTRs

I was wondering where we stand on CSTRs. Is the Transient Housing Study considering recommendations to change the zoning district use permissions? When might study recommendations be made? I support keeping CSTRs as permitted uses within all the Article 15 zoning districts - especially the EC District. With universities under attack and losing federal funding if they are not sufficiently MAGA, it is important to give them flexibility to provide space for visiting speakers, researchers, parents, alumni, etc.

On Wednesday, June 18, 2025 at 11:39:47 AM CDT, Rachael Berg <rberg@nola.gov> wrote:

Hi Paul, I'm out sick today but checking emails. What's up?

From: Paul Cramer <paulcramerxxx@yahoo.com>
Sent: Wednesday, June 18, 2025 11:22 AM
To: Rachael Berg <rberg@nola.gov>
Subject: CSTRs

Hi Rachael - do you have a quick minute to chat? I no longer remember your office phone number!!

Paul

Outlook

Re: Comment for Study

From Tara Lambeth <TaraLambeth@Desire-Line.com>
Date Fri 6/20/2025 11:50 AM
To Rachael Berg <rberg@nola.gov>

Received, thank you!

From: Rachael Berg <rberg@nola.gov>
Sent: Friday, June 20, 2025 11:49 AM
To: Tara Lambeth <TaraLambeth@Desire-Line.com>
Subject: Fw: Comment for Study

Please see e-mail below to include as part of the public comments. Thank you!

From: Paul Cramer <paulcramerxxx@yahoo.com>
Sent: Friday, June 20, 2025 11:46 AM
To: Rachael Berg <rberg@nola.gov>
Subject: Comment for Study

Rachael -

The City should treat the S-LRS2 District the same as other residential districts (including S-LRS1) when it comes to temporary residential STRs that are part of one's own owner-occupied home. As we know, this type of STR provides benefits to the owners who may struggle with high property taxes and high insurance rates. It also ameliorates all the negative aspects of STRS such as noise and lack of monitoring. There is no real difference between the characteristics of the LRS1 and LRS2 Districts; therefore they should be treated the same.

Paul Cramer
2244 Killdeer Street

Outlook

New Orleans Transient Lodging Study

From Jackiestroh17 <jackiestroh17@gmail.com>
Date Tue 7/1/2025 10:25 AM
To Land Use Study Distribution List <landuse@Desire-Line.com>

[Some people who received this message don't often get email from jackiestroh17@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

To whom it may concern,

I am genuinely worried that the surveys and focus groups will overrepresent the interests of the property owners.

Their access to "passive income" (eyeroll) allows them more time and simple capacity for engaging in such studies. Whereas those of us working 3-4 jobs, barely scraping by (29y/o single white female with no dependents, born and raised in New Orleans, with an undergraduate degree) and who have been continuously outpriced and pushed out of our housing over the whole STR issue have simply got lower capacity in dealing with the issue. It's tiresome and it is exhausting and I have been trying to see to it that the issue is taken seriously for years now.

In 2019 the apartment I was living in (corner of Music & St Claude, also had two other apartments with residents who'd been there for 7 and 10+ years with a barbershop at the ground level) was sold to an Airbnb development group (Paul Coughlin and co.) who kicked all residents out and converted all three apartments upstairs into one giant grey CSTR. Housing lost for 3 households, and the barbershop was also kicked out. That storefront has sat empty, with curtains closed ever since.

In April 2020, rent at the apartment I'd been living in for 2.5 years was doubled to get me out. They then used it as an STR (never had a license issued, only operated illegally; 7th Ward, N Johnson & Esplanade).

In 2022 rent at my house in the Lower 9th was doubled in order to meet the homeowner's rising insurance and tax costs. I have looked extensively into this issue and there is a correlation - and potential causation - between the rise in STRs (regardless of commercial or "non-commercial" - a BS term) and the rise in both taxes and insurance rates. Insurance, because of increased liability in the houses/neighborhoods; taxes, because of the number of STR owners applying AND RECEIVING homestead exemptions despite not residing on property. When property owners - notice I did not say homeowners- like that get a tax break on their BUSINESS that is meant to assist residents, it raises the taxes on everyone because those folks are not paying their fair share. I have reporting the homestead exemption fraud cases I have discovered (hundreds and potentially thousands) to the Assessor's office which has not risen up to address and monitor or prevent the issue.

That is 3 dwellings in a row that I'd been priced out because the rent was DOUBLED as an effect of the proliferation of both NSTRs and CSTRs in New Orleans.

It's exhausting. While I am ecstatic that the city is finally studying the issue, due in no small part to the role I have certainly played regarding this issue, I am not confident that the people who are negatively effected by the impacts of STRs have the time, the energy, or the wherewithal to communicate the issue. Not to mention that I think many people who are not involved in the business of STRs are not connected to the right channels to even know such a study is happening.

In short, I do not think the study will be getting a balanced perspective. The STR owners in New Orleans have shared the survey in their little Facebook groups and with their friends and will certainly be overrepresented in the results.

I would love to meet to discuss further and share my experience and/or share contact information for numerous other local residents affected by the STRs.

I do hope this study can provide honest insightful results to the regular nuisances and hardships imposed upon the residents and culture makers of New Orleans by STRs and other growing transient lodging types in New Orleans.

Hopeless,
Jackie

Outlook

New Orleans Transient Lodging Study - Missing Info?

From Susan Klein <fqfemme@gmail.com>
Date Tue 7/1/2025 11:43 AM
To Land Use Study Distribution List <landuse@Desire-Line.com>
Cc Susan Klein <fqfemme@gmail.com>

Some people who received this message don't often get email from fqfemme@gmail.com. Learn why this is important

Good Morning,

I have not read the entire study, but does it mention anywhere that STR's are prohibited in the French Quarter and unless the law was changed, the minimum rental time for properties in the FQ is 60 days, not 30. Please include this information in your materials.

Thank you,
Sue Klein

Commercial STR

Laurie Lionnet <laurielionnet@kw.com>

Mon 7/10/2023 11:50 AM

To:CPCINFO <CPCINFO@nola.gov>

EMAIL FROM EXTERNAL SENDER: DO NOT click links, or open attachments, if sender is unknown, or the message seems suspicious in any way. DO NOT provide your user ID or password. If you believe that this is a phishing attempt, use the reporting tool in your Outlook to send this message to Security.

Good Day,

I would like to submit the comment below.

My STR property is in Lake Catherine/NOLA. Lake Catherine is a nine mile island to the far east of downtown NOLA. It is approximately 30 minutes from downtown New Orleans.
The island consists of fishing camps, marinas, and bait shops. There are no hotels or any other accommodations other than the handful of STR properties out there. I believe on the entire island there are approximately 12 - 15 camps that have STR licenses. The area is zoned Maritime Mixed Use.

I just don't see how this area can be lumped into the situation that is currently being an issue in the downtown and surrounding areas. We are a rural community on the outskirts of NOLA. Most people do not even realize it is actually a part of New Orleans.

I ask that this area not be lumped into the masses of inner city properties struggling with the STR rules and regulations. If not for this handful of STRs in Lake Catherine we would not be able to host people from all over the country/world in this unique area of New Orleans.

Best,

Laurie Lionnet
REALTOR®

Keller Williams Realty Professionals
Licensed in the state of Louisiana and Mississippi
Serving Metro New Orleans and Mississippi

(504) 462-9376
laurielionnet@kw.com
www.laurielionnet.com
https://card.get-card.com/laurie-lionnet/



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Hackers are targeting the Real Estate industry. Fraudulent wire instructions are sent to Real Estate Agents and their clients using fake email addresses that appear to come from a trusted source. The Title Company will not email you nor will your agent for wiring instructions. Always call both your agent and the Title Company and not respond to an email.

Please call Keller Williams Realty 455-0100 to confirm wire instructions before wiring funds.

Fw: Whole home CSTR

Robin C. Jones
Mon 7/10/2023 11:59 AM
To:Robin C. Jones <rcjones@nola.gov>

Robin Jones *(she/her/hers)*
Principal City Planner
New Orleans City Planning Commission

From: Patricia Bradford <pbradford@kw.com>
Sent: Monday, July 10, 2023 11:19 AM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Whole home CSTR

EMAIL FROM EXTERNAL SENDER: DO NOT click links, or open attachments, if sender is unknown, or the message seems suspicious in any way. DO NOT provide your user ID or password. If you believe that this is a phishing attempt, use the reporting tool in your Outlook to send this message to Security.

Good Afternoon,
I will not be able to attend the meeting tomorrow, my grandson is having open heart surgery in the morning, otherwise I would be there to speak.
I have a CSTR at 26080 Chef Menteur Hwy, New Orleans, La. 70129. It is a single family, whole house, STR, on an acre of land, outside the city limits of New Orleans. This property is zoned for STR and I would hope that there will not be any changes to the rules pertaining to these types of properties. The majority of houses along Chef Hwy past the Chef Pass, are vacation rentals and allow guests from all over the world to experience what our Louisiana Sportsman's Paradise is truly about.

Patty Bradford, Realtor
(504)416-7747 cell
pbradford@kw.com

Download my Mobile App to Start Your Real Estate Search
app.kw.com/KW1DPFC6

Keller Williams Realty 455-0100
3197 Richland Ave
Metairie, La 70002
Office (504)455-0100
Member Agent Leadership Council
Licensed by the Louisiana Real Estate Commission
Each Office Independently Owned and Operated

If you or someone you know is interested in a career in real estate, call me. I would love to help you get started.

WAIT! BEFORE YOU WIRE.

Hackers are targeting the Real Estate industry. Fraudulent wire instruction are sent to Real Estate Agents and their clients using fake email addresses that appear to come from a trusted source. The Title Company will not email you nor will your agent for wiring instructions. Always call both your agent and Title Company and not respond to an email.

Please call Keller Williams Realty 455-0100 to confirm wire instructions before wiring funds.

Outlook

Fwd: Urgent Need to Address CSTR Loopholes and Protect Long-Term Residents

From Nadia Jenkins <nadejdajenkins@gmail.com>
Date Mon 10/13/2025 5:51 PM
To CPCINFO <CPCINFO@nola.gov>; Kim Keene <kimkeene19@gmail.com>; Eric France <efrance@cox.net>; Alexander Calvo <acalvo.sc@gmail.com>

2 attachments (335 KB)
Letter to city planning commission 101325.docx; petition against the CSTR loopholes.pdf;

From:

Nadejda Jenkins France

1201 Canal Street 205, New Orleans, LA 70112
nadejdajenkins@gmail.com
251-533-4953

To:

New Orleans City Planning Commission
New Orleans City Council
Department of Safety and Permits
City Hall, 1300 Perdido Street, Room 1E07
New Orleans, LA 70112

Subject: Urgent Need to Address CSTR Loopholes and Protect Long-Term Residents

Attached: 1201 canal residents letter with signatures

Dear Director Rivers, Councilmembers King, Moreno, Harris, and Morrell, and Members of the New Orleans City Planning Commission:

I am writing to express my deep concern regarding the ongoing issue of Commercial Short-Term Rentals (CSTRs) and the significant loopholes that undermine the safety and quality of life for long-term residents in condominium buildings. As a concerned citizen and resident of New Orleans, I urge you to take immediate and decisive action to address these loopholes and protect our communities by including specific language in the Transient Lodging Study recommendations which will be replacing current IZD protection as it expires in November.

I have reviewed the Transient Lodging Study (Motion M-23-247) and the Public Hearing Notice dated October 28, 2025, and I am particularly alarmed by the continued exploitation of regulatory gaps that allow residential buildings to operate as de facto hotels without proper oversight or consideration for the well-being of long-term residents. The recent

actions by the developer of 1201 Canal Condominiums, who is circumventing regulations by placing units in 30-day+ rentals without CSTR permits, highlight the urgent need for comprehensive reforms. During the July 9th City Council meeting, the 1201 Canal owners and renters spoke loud and clear in support for M-25-389 and prohibiting the current developer and any future large block unit owners from obtaining CSTR or Bed and Breakfast permits at 1201 Canal Street.

The current regulations are insufficient in addressing the following critical issues:

1. **Ban on 30-Day Rentals in Condominiums with Long-Term Residents**: The 30-day+ rental loophole allows developers to exploit state regulations, undermining the safety and stability of long-term residents. This practice not only threatens the quality of life for those paying full-time taxes but also reduces the availability of long-term housing stock.
2. **Requirement for CSTR Permits for Any Rental <90 Days**: The current cap of 90 days per year for residential units is being exploited by developers who rent units for 30+ days without CSTR permits. This loophole must be closed to ensure that all short-term rentals, regardless of duration, are subject to the same regulatory standards.
3. **Mandate Separate Entrance for CSTR Dwelling Units**: In buildings that house both long-term and short-term residents, separate entrances for CSTR units are essential to mitigate the negative impacts on the quality of life for long-term residents. This measure would also help in enforcing regulations and ensuring the safety and security of all residents.

The City Planning Commission and the City Council must act swiftly to incorporate these recommendations into the Transient Lodging Study. The preliminary study report and public feedback have highlighted the need for stronger regulations, including density limitations, requirements for on-site operators, and the establishment of use standards for transient lodging uses.

I urge you to consider the following actions:

- Extend the 90-day definition to include any rental advertised or occupied for 90 nights or fewer per year, regardless of the owner's claims regarding the duration of each stay.
- Implement stricter density limitations and other standards for transient lodging uses that are for residential or mixed-use zoning districts.
- Require separate entrances for CSTR units in buildings with long-term residents to ensure safety and mitigate quality of life impacts.
- Increase the price of CSTR permits and establish an overall cap on the number of permits to limit the proliferation of short-term rentals and protect long-term housing availability.

The actions taken by the 1201 Canal developer, as detailed in the petition against CSTR loopholes, underscore the urgency of this matter. The developer's ability to exploit state loopholes and place units in 30-day rentals without CSTR permits is not only detrimental to the community but also undermines the intent of Motion M-23-120 to close these loopholes.

I implore you to take immediate action to address these critical issues and protect the rights and well-being of long-term residents. The safety, stability, and quality of life of our

communities depend on your leadership and decisive action.

Thank you for your attention to this urgent matter. I look forward to your prompt and effective response.

Sincerely,
Nadejda Jenkins France

Date: 8/14/2025

To: New Orleans City Planning Commission, New Orleans City Council, Department of Safety and Permits

From: 1201 Canal Condominiums Residents and Concern Citizens

Re: Pending Transient Lodging Study Motion **M-23-247** which replaces **Motion No. M-23-120**; we are asking to accept comments outside of CPC comment window and consider a special case of condominiums outside of the zoning district considerations

Dear Director Rivers and Councilmembers King, Moreno, Harris, and Morrell:

We urge CPC and City Council Members to amend Transient Lodging Study and, consider **regardless of the zoning, special cases of condominium buildings** where the **developer/block owner retains a controlling interest** in the condominium and CSTR matters are not under residents' control, and we are asking you to consider such special cases and ask Councilmembers to:

Ban 30-day rentals in condominium buildings with long-term residents and

Require the CSTR permits for ANY rental <90 days and

Mandate separate entrance to access CSTR dwelling units

We, 1201 Canal residents, learned about the Transient Lodging study on July 10th during the City Council hearing **Motion M-25-389**. At that time, the window for public comments had already closed.

1201 Canal developer's IZD appeal for 25% (58 units) to be placed in **CSTR permit was rescinded** by the City Council in Motion **M-25-389** as granted based on "materially misleading application materials" and "long-term tenants of the units which are the subject of the IZD appeal have been displaced through notices to vacate, resulting in a decrease of long-term housing." Currently, the developer is placing the same units in **30-day rentals**, undermining the safety of residents and the intensions behind the M-23-120 to **close the loopholes** that allow residential building operating as hotels.

Residents at 1201 Canal and concerned citizens are urging the City Councilmembers to **extend the 90-day definition** so that **any** rental **advertised or occupied for 90 nights or fewer per year** is **automatically deemed a short-term rental**—regardless of whether the owner claims each stay is 30 days.

While 1201 Canal's residential units are capped at 90 days/yr, the developer can exploit a state loophole to rent units for 30+ days without CSTR permits. Furthermore, the developer has already benefited economically from the condominium's development and allowing 30-day CSTRs would create **no new investment** or consideration for the community's needs, while resulting in **the disruption to the quality of life** for owners paying full-time taxes and reduction in long-term housing stock.

Sincerely,

Nadejda Jenkins France

Nadejda Jenkins France 1201 Canal Street #205	

Sloane Clay	Sloane Clay 211
Prashanth Balaraman	Prashanth Balaraman 206
Prashanth Balaraman	Prashanth Balaraman 211
Sloane Clay	Sloane Clay 206
Timothy Martin	Tim Martin 210
	matt Shelton 272
	RACHMANNA 254
Beth E. Johnson	Beth E. Johnson 603
	Eric France 205
Alex Calvo #562	Alex Calvo 562
Michelle Calvo	Michelle Calvo 562
Kim Keene	Kim Keene 265
Cesar Lombana	John Lombana 273
Debra Lombana 273	
Cynthia Landaw	Cynthia Robidoux 270
Sheila Griffith	Sheila Griffith 418
Nicholas Willian	Nicholas Willian 356
Justin Kinslow	[illegible] 356
CHRISTINE KWIK 364	VERNON MARTINEZ 364
Sabrina Heavey 226	Sabrina Heavey 226
Iman Dannouf 517	
	MARCY GRANT
Gary Keene	Gary Keene 265
Carl W. Davis	CARL DAVIS 406
	JERRY PROVENZA 355
	Courtlyn Thornton 472
	Wade Pittbeut 255
	Beatrice G. Jones 255
CHARLOTTE GREEN	Charlotte Green 221
Deryn Patin	427
Shanil Gik Mansukhani	310

[signature]	AMANDA WESLEY #319
Imran Rugh 460	
Andre' Neff 460	
Jane Place	Jane Place Neigh. Sus. Int.
KIRILL ALEXANDROV	
NIKITA ALEXANDROV	SUNSHINE COAST

Date: 8/14/2025

To: New Orleans City Planning Commission, New Orleans City Council, Department of Safety and Permits

From: 1201 Canal Condominiums Residents and Concern Citizens

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Sincerely,

Scott Shaw	UNIT 461
Jeanne Breaux	

Outlook

Fw: TRANSIENT LODGING STUDY comment

From Rachael Berg <rberg@nola.gov>
Date Tue 10/14/2025 10:07 AM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

Please see comment below

Get Outlook for iOS

From: Sabine E. Lebailleux <selebailleux@nola.gov>
Sent: Tuesday, October 14, 2025 7:48:16 AM
To: Rachael Berg <rberg@nola.gov>
Subject: Fw: TRANSIENT LODGING STUDY comment

Rachael,

Do we have a folder to save comments about the Transient Lodging Study?

From: CPCINFO <CPCINFO@nola.gov>
Sent: Tuesday, October 14, 2025 9:42 AM
To: Sabine E. Lebailleux <selebailleux@nola.gov>
Subject: Fw: TRANSIENT LODGING STUDY comment

From: john youtube <jctubers1@gmail.com>
Sent: Sunday, October 12, 2025 9:49 AM
To: CPCINFO <CPCINFO@nola.gov>
Subject: TRANSIENT LODGING STUDY comment

My comments are:

1. this change seems unncessary and what the city has in place today is fine
2. the main issue is just airbnbs in residential neighborhoods and the city already took care of that
3. is this really the best use of the city resources?? what about crime and creating jobs?

Outlook

Re: PUBLIC COMMENTS Regarding the Transient lodging Study

From Tara Lambeth <TaraLambeth@Desire-Line.com>
Date Thu 10/16/2025 2:08 PM
To Rachael Berg <rberg@nola.gov>

Received, thank you!

From: Rachael Berg <rberg@nola.gov>
Sent: Thursday, October 16, 2025 12:00 PM
To: Tara Lambeth <TaraLambeth@Desire-Line.com>
Subject: Fw: PUBLIC COMMENTS Regarding the Transient lodging Study

---

From: Robert D. Rivers <rdrivers@nola.gov>
Sent: Thursday, October 16, 2025 11:26 AM
To: CPCINFO <CPCINFO@nola.gov>; Stephen K. Kroll <skroll@nola.gov>; Larry W. Massey Jr. <lwmassey@nola.gov>; Rachael Berg <rberg@nola.gov>
Subject: Re: PUBLIC COMMENTS Regarding the Transient lodging Study

Transient Lodging Study. Copying Rachael.

From: CPCINFO <CPCINFO@nola.gov>
Sent: Thursday, October 16, 2025 9:49 AM
To: Stephen K. Kroll <skroll@nola.gov>; Robert D. Rivers <rdrivers@nola.gov>; Larry W. Massey Jr. <lwmassey@nola.gov>
Subject: FW: PUBLIC COMMENTS Regarding the Transient lodging Study

Good morning,

Can someone please advise where this comment should be saved?

Best,

Bria Dixon *| She/Her/Hers*
Senior City Planner | New Orleans City Planning Commission
Office of Business and External Services
1300 Perdido Street, 7th Floor | New Orleans, LA 70112
(504) 658-7014 (office) | Bria.Dixon@nola.gov

From: Kim Keene <kimorleans@aol.com>
Sent: Thursday, October 16, 2025 7:20 AM

To: CPCINFO <CPCINFO@nola.gov>
Subject: PUBLIC COMMENTS Regarding the Transient lodging Study

Dear New Orleans City Planning Commission,

I am writing to express my deep concern about the ongoing issues surrounding Commercial Short-Term Rental (CSTR) regulations, which continue to erode the safety, stability, and quality of life for long-term residents in New Orleans condominium communities and surrounding neighborhoods.

Developers are exploiting loopholes in the current rules—particularly the 30-day rental exception—to convert residential buildings into de facto hotels. This practice circumvents the city's permitting process and undermines the intent of existing protections. As the Interim Zoning District (IZD) regulations near expiration in November, I urge you to strengthen the Transient Lodging Study (Motion M-23-247) to ensure it provides meaningful safeguards for residents and for our neighborhoods.

The situation at 1201 Canal Condominiums illustrates the urgency of this issue. Despite strong community support for Motion M-25-389, which would have prohibited CSTR and Bed & Breakfast permits at this property, the developer withdrew the appeal, and the Council later rescinded the motion. Since then, the developer has resumed marketing 30-day rentals—clearly exploiting a regulatory gap.

The broader impact of STR proliferation is well-documented:

- **Neighborhood Displacement**: In areas like Marigny, Bywater, and Treme, 10–16% of housing units are STRs, displacing long-term residents and accelerating gentrification. [housingnola.org]
- **Housing Affordability**: STRs have removed thousands of homes from the long-term rental market, contributing to rising rents and home prices citywide. [jpnsi.org]
- **Community Disruption**: STRs often bring transient guests with no stake in the neighborhood, leading to increased noise, trash, and safety concerns. This degrades the sense of community and discourages long-term residency. [lafairhousing.org]
- **Hotel Industry Impact**: STRs create unfair competition by operating without the same tax burdens, safety standards, or employment obligations as hotels. This undermines a key sector of New Orleans' tourism economy and shifts visitor dollars away from local jobs. [crai.com]
- **Small Business Volatility**: While some businesses benefit from tourist foot traffic, others suffer from the instability caused by fluctuating neighborhood populations. Long-term residents provide consistent patronage, while STR guests often spend in tourist zones, bypassing local establishments. [jpnsi.org]

To preserve the integrity of our housing and protect long-term residents, I respectfully recommend the following actions:

- **Ban Short-Term Rentals and 30-day rentals in condominium buildings with long-term residents.** The 30-day+ rental loophole allows developers to exploit state regulations, undermining the safety and stability of long-term residents. This practice not only threatens the quality of life for those paying full-time taxes but also reduces the availability of long-term housing stock.
- **Require CSTR permits for any rental under 90 days, regardless of how it is advertised.** The current cap of 90 days per year for residential units is being exploited by developers who rent units for 30+ days without CSTR permits. This loophole must be closed to ensure that all short-term rentals, regardless of duration, are subject to the same regulatory standards.
- **Mandate separate entrances for CSTR units in residential or mixed-use buildings.** In buildings that house both long-term and short-term residents, separate entrances for CSTR units are essential to mitigate the negative impacts on the quality of life for long-term residents. This measure would also help in enforcing regulations and ensuring the safety and security of all residents.
- **Implement density limits, increase permit fees and fines, and cap the total number of CSTR permits to stabilize residential housing.**

Updating the Transient Lodging Study with these measures is essential to closing existing loopholes, restoring balance between tourism and community living, and ensuring that New Orleans remains a livable city for its residents.

Thank you for your leadership and attention to this critical issue.

Kimberly

Outlook

Re: Comment for CITY PLANNING COMMISSION PUBLIC HEARING NOTICE - TRANSIENT LODGING STUDY - TUESDAY, OCTOBER 28, 2025, 1:30 P.M.

From Tara Lambeth <TaraLambeth@Desire-Line.com>
Date Mon 10/20/2025 2:39 PM
To Rachael Berg <rberg@nola.gov>

Received, thank you!

From: Rachael Berg <rberg@nola.gov>
Sent: Monday, October 20, 2025 1:29 PM
To: Tara Lambeth <TaraLambeth@Desire-Line.com>
Subject: Fw: Comment for CITY PLANNING COMMISSION PUBLIC HEARING NOTICE - TRANSIENT LODGING STUDY - TUESDAY, OCTOBER 28, 2025, 1:30 P.M.

From: CPCINFO <CPCINFO@nola.gov>
Sent: Monday, October 20, 2025 1:29 PM
To: Rachael Berg <rberg@nola.gov>
Subject: Fw: Comment for CITY PLANNING COMMISSION PUBLIC HEARING NOTICE - TRANSIENT LODGING STUDY - TUESDAY, OCTOBER 28, 2025, 1:30 P.M.

Hey Rachel,

Saved in the G:\Comprehensive\CPC Studies\2023 Transient Uses - CSTR Study\Public Comment\2025 folder.

Best,
Julia

From: jc <johndog1net@yahoo.com>
Sent: Monday, October 20, 2025 1:18 PM
To: CPCINFO <CPCINFO@nola.gov>; Freddie King <Freddie.King@nola.gov>; Helena N. Moreno <Helena.Moreno@nola.gov>; Jean-Paul Morrell <JP.Morrell@nola.gov>
Cc: Alex McMurray <alexmcmurrayinfo@gmail.com>; Kourtney Keller <kourtneykeller@gmail.com>; Alma Taylor <almaptaylor@gmail.com>; stephenb.beasley@gmail.com <stephenb.beasley@gmail.com>; sara slaughter <sara.slaughter@gmail.com>; Sergio A Alvarez <seralval@gmail.com>; Amy Connolly <awebbeking@gmail.com>
Subject: Comment for CITY PLANNING COMMISSION PUBLIC HEARING NOTICE - TRANSIENT LODGING STUDY - TUESDAY, OCTOBER 28, 2025, 1:30 P.M.

To the New Orleans Panning Commission

I am commenting for the upcoming City Planning Commission concerning Transient Lodging. The public notice cites the Desire Line LLC will

present findings at the hearing. Those findings were not included in the Public Notice.

I live with my family at 625 Gallier Street, NOLA 70117. We are fortunate to have great neighbors. We have been exposed to the Commercial and Private Short Term Rental excesses facing our neighborhood and the greater New Orleans community. Within our block we have multiple private STR, both with homes occupied by the owners and STR that are not owner occupied, it is hard to know which are permitted under the CNO.

We also have three Commercial Short-Term Rentals located at 3513, 3517 and 3521 Chartres Street. These properties are managed by Stay Heirloom.

The three CSTR units are standalone three-story structures with each having the capacities of 10 occupants. Each unit has a large open deck overseeing individual swimming pools and hot tubs. The units were built with no consideration for the neighborhood. Each of the three swimming pools, hot tubes and decks align with the windows of our neighbor's private home located at 614 Congress Street, almost as if by design. The CSTR units can see into the home from the first, second and third floor. From the private home each window has an uninterrupted view of each of the CSTR properties swimming area, back deck, and a view through each CSTR units to the front door.

Sound carries through the neighborhood impacting many residents to include my home. The cliental vary from discrete guests to guests that carry on without respect for the neighborhood, cursing and partying late into the evening and late night. Our quality of life and likely our property values has been adversely impacted. We cannot enjoy our own yards and find ourselves staying in our homes to avoid the sound. The homes adjacent to the properties often cannot get away from the sound even when indoors.

These units were designed and built for CSTR in a residential area. How? It may be that the CSTR units are permitted due to Chartres Street being zoned for light industrial? Regardless, measures to mitigate the privacy of the neighborhood have been ignored, the neighborhoods efforts to secure resolution with the Stay Heirloom has yielded little results.

As a neighborhood we find ourselves having to document violations of our privacy and peace of mind to inform the Compliance department of the CNO. We find ourselves having to communicate and advocate directly with the Stay Heirloom representatives and the constant turnover.

For the hearing the City Planning Commission should address any new construction actively that is abutting residential homes and neighborhoods, treat units like the Stay Heirloom units as hotels, not CSTR, requiring an onsite manager at all times of occupancy, limit the

occupancy of each unit and consider the density of three side by side units.

We are currently asking Stay Heirloom to seek a waiver from the CNO permitting department and the HDLC to elevate the fence to 12 feet and to build it with concrete blocks to reduce the line of vision into the adjacent home and equally important to reduce the sound which impacts all of us.

We are frustrated; we are exasperated; we need help. We also do not want to see this propagated further within the greater New Orleans.

Respectfully,
John Connolly
625 Gallier Street
New Orleans, LA 70117

---------- Forwarded message ---------
From: **City of New Orleans** <neworleans@public.govdelivery.com>
Date: Fri, Oct 10, 2025 at 12:56 PM
Subject: CITY PLANNING COMMISSION PUBLIC HEARING NOTICE - TRANSIENT LODGING STUDY - TUESDAY, OCTOBER 28, 2025, 1:30 P.M.

Outlook

FW: GNOHLA Special Board Meeting-September 18th 10am- Zoom

From Nicole Webre <nicole@webreconsulting.com>
Date Fri 9/19/2025 2:32 PM
To Tara Lambeth <TaraLambeth@Desire-Line.com>
Cc Mavis Early (mavisearly@icloud.com) <mavisearly@icloud.com>; Travis Tague <travis.tague@omnihotels.com>; David Piscola <david.piscola@hilton.com>

Good afternoon, Tara,

On behalf of the Greater New Orleans Hotel Lodging Association (GNOHLA) Board and Members, please accept the following recommendations to be incorporated into the public input for the Transient Lodging Study. Specifically, after years of research and discussion, GNOHLA's Board considered and voted to recommend the following amendments (underlined) to the definitions of HOTEL/MOTEL and Customary Lodging Services in the City Code and Comprehensive Zoning Ordinances (CZO).Please confirm receipt of our recommendations.

The following are the current and proposed definitions for **Hotel/ Motel** and **Customary Lodging Services.** These proposed additional language provides more clarity that helps city enforcement and to further set hotels and motels apart from other types of transient lodging uses.

Hotel/Motel (*Proposed* additional language addressing building code compliance is underlined):

"An establishment providing a private room for sleeping accommodations for a fee with private bathroom facilities and customary lodging services. Related ancillary uses may include, but are not limited to conference and meeting rooms, restaurants, sale of convenience items, bars, and recreational facilities. Hotels shall be permitted to include units for sale designed or used exclusively for permanent residential use in all districts except in Light Industrial (LI), Heavy Industrial (HI), and Business Industrial Park (BIP) districts. Prior to the issuance of a Certificate of Occupancy and/or Occupational License the hotel or motel shall be in compliance with all federal, state and local laws and commercial transient lodging building codes."

Customary Lodging Services definition and standards (*Proposed* additional language addressing staff restroom is underlined):

Customary Lodging Services. Guest services provided by lodging facilities including hotels/motels. Customary services include at a minimum 1) dedicated lobby space to adequately enable check-in/check-out procedures with a restroom (private or public) available for staff at all hours, and 2) personnel/staffing to assist guests at check-in/check-out; and 3) at least one on-site, on-duty staff member that is physically present at all times and capable of immediately assisting guests, overseeing operations of the facility, addressing safety and security matters and responding to emergencies.

Thank you for your time and attention. Have a great weekend!

Sincerely,

Nicole

J. Nicole Webre, J.D.
Principal Consultant
Webre Consulting
O: 504.605.3699
M: 504.473.6940
www.webreconsulting.com

This email communication may contain privileged and/or confidential information and is intended exclusively for the recipient(s). If you received this email in error, please delete and notify the sender.

Outlook

Fw: 1201 Canal Condominiums STR Comments

From Rachael Berg <rberg@nola.gov>
Date Tue 10/21/2025 4:01 PM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

From: Julia I Nickle <Julia.Nickle@nola.gov>
Sent: Tuesday, October 21, 2025 4:00 PM
To: cesarlombana10@gmail.com <cesarlombana10@gmail.com>
Cc: Rachael Berg <rberg@nola.gov>; Laura B. Bryan <Lbbryan@nola.gov>
Subject: Re: 1201 Canal Condominiums STR Comments

Your comment has been received and recorded. Thank you, Cesar.

Best,
Julia

Julia I. Nickle (she/her)
City Planner I | New Orleans City Planning Commission
Office of Business and External Services (OBES)
1300 Perdido Street, 7th Floor | New Orleans, LA 70112
(504) 658-7031 (office) | julia.nickle@nola.gov

Please be advised that all email correspondence is subject to the state's public records laws.

RESOURCES:
Application forms
Property Viewer (check the zoning of a property)
Comprehensive Zoning Ordinance
One Stop App
Frequently Asked Questions

From: CPCINFO <CPCINFO@nola.gov>
Sent: Tuesday, October 21, 2025 9:05 AM
To: Julia I Nickle <Julia.Nickle@nola.gov>
Subject: Fw: 1201 Canal Condominiums STR Comments

From: Cesar Lombana <cesarlombana10@gmail.com>
Sent: Monday, October 20, 2025 4:21 PM

To: CPCINFO <CPCINFO@nola.gov>
Subject: 1201 Canal Condominiums STR Comments

My name is Cesar Lombana and I am a resident of 1201 Canal St Condominiums located at Canal St and Basin. I have lived and owned this condo residence for the last 12 years. I would like to submit my comments for your consideration at the upcoming Public Hearing on Tuesday, October 28,2025.
The purpose of this email is to express my concern about Transient Lodging focusing on Short-term rentals. I offer my following comments, to help us maintain the long-term objectives by which we purchased our homes.
This action has been brought about by becoming aware that the mode of operation of the developer has changed from the original goals of property ownership to the desire to incorporate short-term rentals for the developers use only.

I recommend the need for including the following issues.

1. Stop all STR's in our buildings
2. Redefine STR's as any rental less than 90 days
3. Establishment of permits for any owner/developer/corporation/entity for STR
4. Establish limits and fees to reduce the footprint of approved STR locations which will keep neighborhoods liveable
5. Establish steep fines to prevent abuse and enforce regulation

Without proper controls and oversight we are jeopardizing the integrity of homes and our community with possible impact to our safety and financial security. We asked for your consideration along with understanding the substantial impact this will have on our lives and future.

Respectfully submitted,

Cesar Lombana
1201 Canal Street
Unit 273

Outlook

Re: Transient Lodging Study to address the 30+ date unregulated CSTR loopholeFwd: Urgent Need to Address CSTR Loopholes and Protect Long-Term Residents

From Tara Lambeth <TaraLambeth@Desire-Line.com>
Date Fri 10/24/2025 12:27 PM
To Rachael Berg <rberg@nola.gov>

Received, thank you!
Sent from my iPhone

On Oct 24, 2025, at 12:20 PM, Rachael Berg <rberg@nola.gov> wrote:

From: Sarah C King <Sarah.King@nola.gov>
Sent: Friday, October 24, 2025 12:18 PM
To: Rachael Berg <rberg@nola.gov>; Laura B. Bryan <Lbbryan@nola.gov>
Subject: FW: Transient Lodging Study to address the 30+ date unregulated CSTR loopholeFwd: Urgent Need to Address CSTR Loopholes and Protect Long-Term Residents

Public Comment 10.24.25

Sarah C. King (she/her/hers)
Senior City Planner | New Orleans City Planning Commission
1300 Perdido Street, 7th Floor | New Orleans, LA 70112
(504) 658-7021 (office) | sarah.king@nola.gov

RESOURCES:
Application Forms
Property Viewer (check the zoning of a property)
Comprehensive Zoning Ordinance
One Stop App
Frequently Asked Questions
Short Term Rental Administration - Home - City of New Orleans (nola.gov)

From: Nadia Jenkins <nadejdajenkins@gmail.com>
Sent: Friday, October 24, 2025 11:13 AM
To: CPCINFO <CPCINFO@nola.gov>; Eric France <efrance@cox.net>; Kim Keene <kimkeene19@gmail.com>; Alexander Calvo <acalvo.sc@gmail.com>
Subject: Transient Lodging Study to address the 30+ date unregulated CSTR loopholeFwd: Urgent Need to Address CSTR Loopholes and Protect Long-Term Residents

Dear Executive Director Rivers,

In addition to my request representing a signed petition by the 1201 Canal residents emailed to you on 10/13 regarding the clearly emerged need to address the loopholes in the CSTR and include 30+ to 90 day unregulated rentals into the definition of the STR/permissible uses and for the city to collect administrative fees and provide the oversight for safety and security of the permanent residents, I am also urging you to release the Transient Lodging Study result and make it available for public review and comment ahead of the 10/28 meeting. Please see the supporting materials on the 10/13 email chain below and the attached documents for your consideration at the 10/28 CPC meeting.

Respectfully,

Nadia Jenkins France
1201 Canal Street, 205
New Orleans, LA 70112
(251) 533-4953

Begin forwarded message:

From: Nadia Jenkins <nadejdajenkins@gmail.com>
Date: October 13, 2025 at 5:49:54 PM CDT
To: CPCINFO@nola.gov, Kim Keene <kimkeene19@gmail.com>, Eric France <efrance@cox.net>, Alexander Calvo <acalvo.sc@gmail.com>
Subject: Fwd: Urgent Need to Address CSTR Loopholes and Protect Long-Term Residents

From:

Nadejda Jenkins France

1201 Canal Street 205, New Orleans, LA 70112
nadejdajenkins@gmail.com
251-533-4953

To:

New Orleans City Planning Commission
New Orleans City Council
Department of Safety and Permits
City Hall, 1300 Perdido Street, Room 1E07
New Orleans, LA 70112

Subject: Urgent Need to Address CSTR Loopholes and Protect Long-Term Residents

Attached: 1201 canal residents letter with signatures

Dear Director Rivers, Councilmembers King, Moreno, Harris, and Morrell, and Members of the New Orleans City Planning Commission:

I am writing to express my deep concern regarding the ongoing issue of Commercial Short-Term Rentals (CSTRs) and the

significant loopholes that undermine the safety and quality of life for long-term residents in condominium buildings. As a concerned citizen and resident of New Orleans, I urge you to take immediate and decisive action to address these loopholes and protect our communities by including specific language in the Transient Lodging Study recommendations which will be replacing current IZD protection as it expires in November.

I have reviewed the Transient Lodging Study (Motion M-23-247) and the Public Hearing Notice dated October 28, 2025, and I am particularly alarmed by the continued exploitation of regulatory gaps that allow residential buildings to operate as de facto hotels without proper oversight or consideration for the well-being of long-term residents. The recent actions by the developer of 1201 Canal Condominiums, who is circumventing regulations by placing units in 30-day+ rentals without CSTR permits, highlight the urgent need for comprehensive reforms. During the July 9th City Council meeting, the 1201 Canal owners and renters spoke loud and clear in support for M-25-389 and prohibiting the current developer and any future large block unit owners from obtaining CSTR or Bed and Breakfast permits at 1201 Canal Street.

The current regulations are insufficient in addressing the following critical issues:

1. **Ban on 30-Day Rentals in Condominiums with Long-Term Residents**: The 30-day+ rental loophole allows developers to exploit state regulations, undermining the safety and stability of long-term residents. This practice not only threatens the quality of life for those paying full-time taxes but also reduces the availability of long-term housing stock.
2. **Requirement for CSTR Permits for Any Rental <90 Days**: The current cap of 90 days per year for residential units is being exploited by developers who rent units for 30+ days without CSTR permits. This loophole must be closed to ensure that all short-term rentals, regardless of duration, are subject to the same regulatory standards.
3. **Mandate Separate Entrance for CSTR Dwelling Units**: In buildings that house both long-term and short-term residents, separate entrances for CSTR units are essential to mitigate the negative impacts on the quality of life for long-term residents. This measure would also help in enforcing regulations and ensuring the safety and security of all residents.

The City Planning Commission and the City Council must act swiftly to incorporate these recommendations into the Transient Lodging Study. The preliminary study report and public feedback have highlighted the need for stronger regulations, including density limitations, requirements for on-site operators, and the establishment of use standards for transient lodging uses.

I urge you to consider the following actions:

- Extend the 90-day definition to include any rental advertised or occupied for 90 nights or fewer per year, regardless of the owner's claims regarding the duration of each stay.
- Implement stricter density limitations and other standards for transient lodging uses that are for residential or mixed-use zoning districts.
- Require separate entrances for CSTR units in buildings with long-term residents to ensure safety and mitigate quality of life impacts.
- Increase the price of CSTR permits and establish an overall cap on the number of permits to limit the proliferation of short-term rentals and protect long-term housing availability.

The actions taken by the 1201 Canal developer, as detailed in the petition against CSTR loopholes, underscore the urgency of this matter. The developer's ability to exploit state loopholes and place units in 30-day rentals without CSTR permits is not only detrimental to the community but also undermines the intent of Motion M-23-120 to close these loopholes.

I implore you to take immediate action to address these critical issues and protect the rights and well-being of long-term residents. The safety, stability, and quality of life of our communities depend on your leadership and decisive action.

Thank you for your attention to this urgent matter. I look forward to your prompt and effective response.

Sincerely,
Nadejda Jenkins France

<Letter to city planning commission 101325.docx>
<petition against the CSTR loopholes.pdf>

City Planning Commission Speaker Card

OCT 28, 2025

d like to speak regarding CPC Docket : Short Term Rental docket #13

INFORMATION ONLY

: JOHN CONNOLLY

ss: 623 Gallier St.

m the applicant for this docket

like to cede my time to:

y affirm that the written or oral statements I give before the City Planning Commission will and correct. By ascribing my signature below, I acknowledge all information presented is wn volition and true and correct to the best of my knowledge.

lease check if you are a paid representative or receiving any type of compensation or ning of value in exchange for speaking or attending today.

re of Speaker:

City Planning Commission Speaker Card

Date : 10/28/25

I would like to speak regarding CPC Docket : #13

INFORMATION ONLY

Name: Angela Owczarek (Jane Place)

Address: 200 S Broad Street, Suite #204

○ I am the applicant for this docket

○ I'd like to cede my time to:

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker:

City Planning Commission Speaker Card

Date : 10/28/25

I would like to speak regarding CPC Docket : #13 TRANSIENT LODGING

INFORMATION ONLY

Name: ERIN HOLMES

Address: 816 N. RAMPART

○ I am the applicant for this docket

○ I'd like to cede my time to:

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☑ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker:

City Planning Commission Speaker Card

Date : 10/28/2025

I would like to speak regarding CPC Docket : #13 Transient Lodging Study

INFORMATION ONLY

Name: Kourtney M. Keller

Address: 615 Gallier St. NOLA 70117

○ I am the applicant for this docket

○ I'd like to cede my time to:

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: Kourtney M. Keller

13

City Planning Commission Speaker Card

Date : 10/28/2025

I would like to speak regarding CPC Docket : M-23-241 Transient Lodging

IN OPPOSITION

Name: Gregori GATTO

Address: 2240 ST LOUIS ST. NEW ORLEANS 70119

○ I am the applicant for this docket

○ I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: _____

#13

City Planning Commission Speaker Card

Date : 10/28/25

I would like to speak regarding CPC Docket : STR

IN SUPPORT

Name: Constance Donnad

Address: 510 N Lopez

○ I am the applicant for this docket

○ I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: _____

City Planning Commission Speaker Card

Date : 10/28/25

I would like to speak regarding CPC Docket : #13 TRANSIENT LODGING

INFORMATION ONLY

Name: ELEANOR GRAHA

Address: _____

○ I am the applicant for this docket

○ I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: E. Graha

13

City Planning Commission Speaker Card

Date : 10/28

I would like to speak regarding CPC Docket : STR

IN SUPPORT

Name: Allen Johnson

Address: 1418 Chartres

○ I am the applicant for this docket

○ I'd like to cede my time to: _____

I hereby affirm that the written or oral statements I give before the City Planning Commission will be true and correct. By ascribing my signature below, I acknowledge all information presented is of my own volition and true and correct to the best of my knowledge.

☐ Please check if you are a paid representative or receiving any type of compensation or thing of value in exchange for speaking or attending today.

Signature of Speaker: _____

Outlook

Re: Updated Link: Transient Lodging Study Report Available

From Tara Lambeth <TaraLambeth@Desire-Line.com>
Date Thu 10/30/2025 2:09 PM
To Alexandra Carter <AlexGelpiCarter@Desire-Line.com>
Cc Eddie Marroquin <EddieMarroquin@Desire-Line.com>; Public Contact Email <contact@Desire-Line.com>

Will do!

From: Alexandra Carter <AlexGelpiCarter@Desire-Line.com>
Sent: Thursday, October 30, 2025 2:09 PM
To: Tara Lambeth <TaraLambeth@Desire-Line.com>
Cc: Eddie Marroquin <EddieMarroquin@Desire-Line.com>; Public Contact Email <contact@Desire-Line.com>
Subject: FW: Updated Link: Transient Lodging Study Report Available

Tara, please include the below email in the Public Comment Folder.
Eddie – do not respond.

DESIRE LINE

Alex Gelpi Carter, AICP
President & CEO at Desire Line
P: 504-388-0482
E: AlexGelpiCarter@desire-line.com
3813 Division Street, Suite A
Metairie, LA 70002
www.desire-line.com

From: Derek Fossier <dfossier@gmail.com>
Sent: Thursday, October 30, 2025 1:59 PM
To: Email Distribution <distribution@Desire-Line.com>; cpcinfo@nola.gov
Subject: Re: Updated Link: Transient Lodging Study Report Available

You don't often get email from dfossier@gmail.com. Learn why this is important

I think the Byzantine Empire and Stalinist Russia would be very proud of this report. It's incredibly foolish to think you can plan cities with this level of detail. This city can't even plan a budget. Here's an idea that's worked for all of human history: If you don't like your neighbors, move. If you want to control the area around you, move to a rural area. We are a city. We cannot suffer idiots who think their property Rights extend far past the borders of their deeded property. I've had renter neighbors who have lived in my neighborhood for less than a year think they had a Right to tell me what to do with my property. The surest path to destruction is by elevating these unproductive and useless voices. Affordable Housing can only be solved with explicit new housing targets, by right development, and a CPC who is graded by issuing more than a certain number of permits. We have none of these things.

Furthermore, stop harassing small business owners. Your policies are designed to help big business and not small operators. You are literally choking the life out of this city, which is why 30,000 tax paying families who had the means left and we're left with people like you.

Terribly disappointed by the needless complexity and lag of intellectual rigor (vs process padding) in your report. This was an exercise for you all to scratch your own backs. I'm sure you feel very proud of yourselves and you'll have meetings where you'll tell everyone how smart you are, but these recommendations are disastrous. More of the same. What happened to laissez le bon temps rouler? You killed it. You're wearing its carcass as a skin suit and pretending to be important. Not impressive.

-Derek Fossier

On Thu, Oct 30, 2025 at 1:13 PM NOLA Transient Lodging Study <distribution@desire-line.com> wrote:

-

View this email in your browser

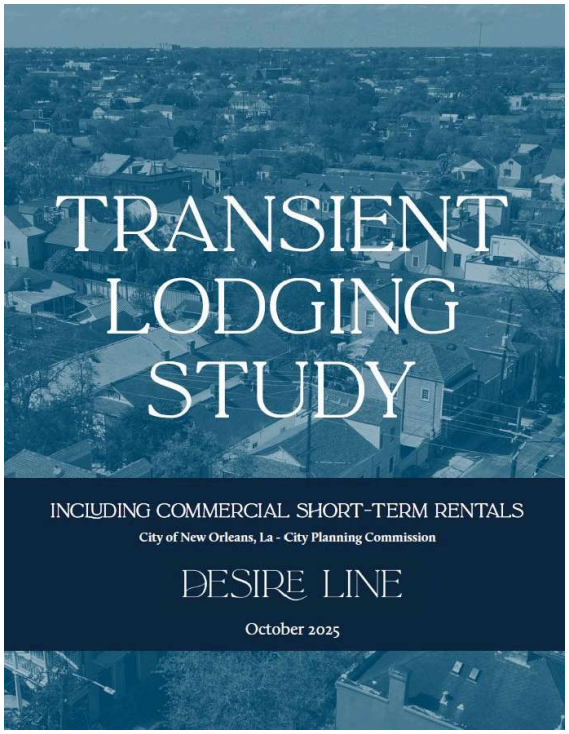
CITY OF NEW ORLEANS
CITY PLANNING
COMMISSION

TRANSIENT LODGING STUDY
INCLUDING COMMERCIAL SHORT TERM RENTALS

Transient Lodging Study Report & Presentation on Dec. 9

Updated Link: If anyone had issues accessing the report yesterday, please use the below button that links to the City's website!

View the Report



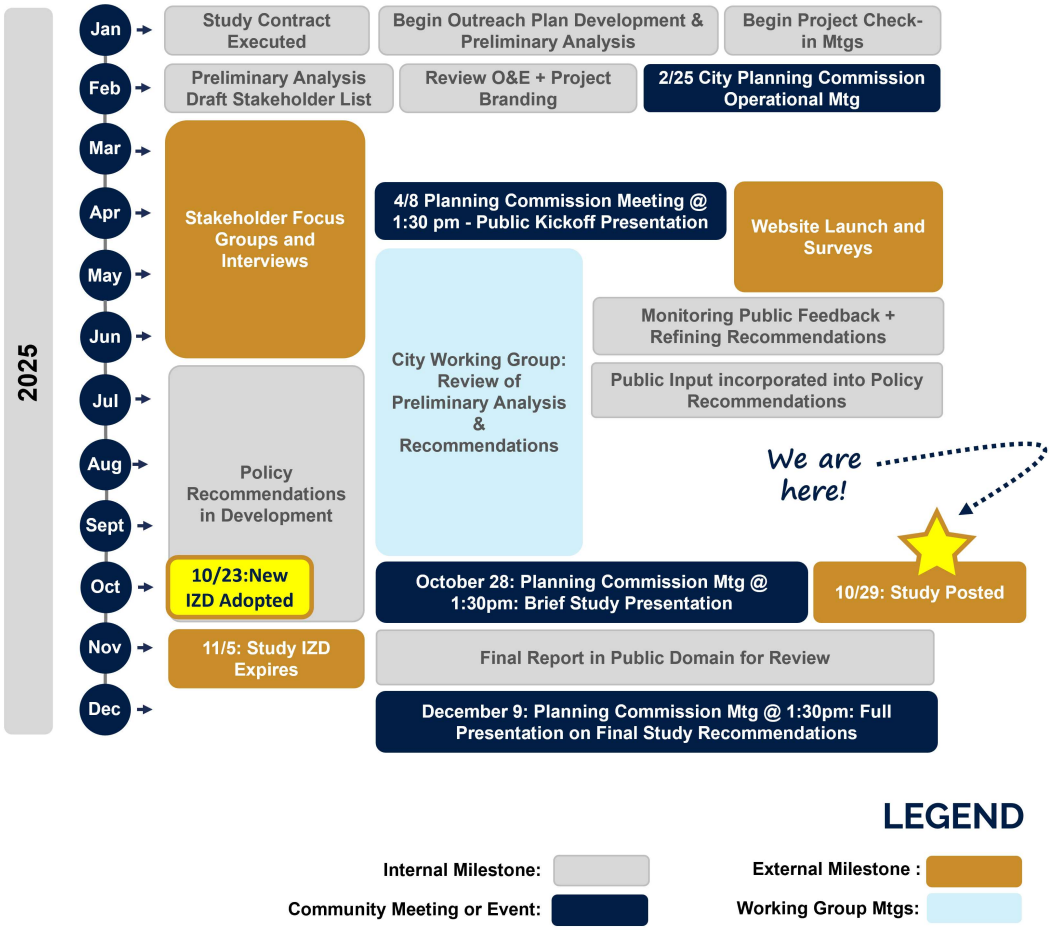
Study Update: A brief presentation regarding the Study was provided at the Planning Commission meeting this past Tuesday, October 28, 2025. Thank you to all who attended this meeting and provided public comment.

At the meeting, the Planning Commission motioned to defer the Study to their **December 9th meeting at 1:30pm** to provide the public with more time to review and consider the Final Report. A second more detailed presentation will be provided on December 9th. *We hope you can join us.*

Visit Project Website

STUDY TIMELINE

Last updated October 2025



DESIRE LINE

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Louisiana Landmarks Society

Pitot House • 1440 Moss Street • New Orleans, Louisiana 70119
Phone: 504-482-0312 • www.louisianalandmarks.org

November 30, 2025

New Orleans City Planning Commission
1300 Perdido Street
New Orleans, LA 70112

RE: Comments on the Transient Lodging Study (October 2025)

Dear Commissioners:

Louisiana Landmarks Society appreciates the work that has gone into the Transient Lodging Study. The analysis, community engagement and recommendations represent a significant step toward addressing the challenges posed by short-term rentals in our city.

We commend the Study's goal of limiting Commercial Short-Term Rentals to one per block in most districts. As the Study documents, 72.8% of survey respondents prioritized stopping illegal CSTRs, 62.6% wanted to preserve year-round housing, and 59.2% wanted to keep neighborhoods residential. The one-per-block limitation area" and "when too many acknowledges what the Study clearly states: "transient lodging uses change the demographics of an land uses on a given block are taken up by transient lodging uses, they contribute to a loss in community character because they change both the urban form and demographics of an area."

We also appreciate the Study's recognition that protecting community character must come first, as stated in the Executive Summary: "it is the very exceptional community character in New Orleans that drives the tourism industry and increases demand for STRs. For this reason, protecting community character must come first."

Areas of Concern

1. CBD-5 District Exemption from Density Limits

We strongly urge the inclusion of CBD-5 in the one-per-block limitation. The Study itself defines CBD-5 as the "Urban Core Neighborhood Lower Intensity Mixed-Use District," explicitly designed as a transitional zone to encourage long-term residents. Particularly desirable is the ability for residents to live near work and transit opportunities. The current recommendation exempts CBD-5 from density restrictions.

However, the Study's own findings support restricting STRs in CBD-5:

- The Study warns that "by limiting CSTRs' continued proliferation—it is likely that prospective buyers will be less likely to inflate housing and building costs, and more units in mixed-use and commercial areas will be made available for long-term housing"
- Survey respondents reported that displacement and unaffordability concerns were concentrated in areas with high STR density
- The Study notes that "limiting the overconcentration of STRs will better protect community character by preserving existing long-term housing units"

By limiting STRs elsewhere while leaving CBD-5 unrestricted, the regulations will simply shift the problem, causing a proliferation in this transitional neighborhood and accelerating the conversion of long-term residential units to short-term rentals. This directly contradicts the district's purpose of encouraging permanent residents.

2. Hostel Definitions and Standards

We encourage more robust work to define and regulate hostels. The Study acknowledges that "existing Hostels are not permitted as separate uses in the permit data despite being a separate use in the Comprehensive Zoning Ordinance," and notes that of four businesses advertising as hostels, two had Hotel licenses and two had Bed and Breakfast Inn licenses.

The proposed minimum standards for hostels include only basic requirements: on-site operator 24/7, sleeping accommodations limited to 2 occupants unless the room contains 70 square feet per occupant (maximum 6 per room), and common bathroom facilities. Without more detailed operational standards similar to those imposed on CSTRs—such as impact management plans, noise abatement requirements, and security protocols—the hostel classification may become an attractive loophole for operators seeking to avoid more stringent CSTR regulations.

Given that hostels would be permitted by right in numerous commercial and CBD districts with no density limitations, inadequate standards could create an unintended consequence of the otherwise thoughtful regulatory framework.

3. French Quarter Hotel Restrictions

We ask that the French Quarter be restricted from additional hotels beyond existing operations. The Study documents that the French Quarter currently has 43 hotels operating as legally nonconforming uses, noting that "hotels are currently prohibited in the French Quarter."

While the Study states that "the current ban on new transient lodging uses in the French Quarter has been effective," the proposed allowances would undermine this success. The French Quarter is one of the nation's most significant historic districts and deserves the strongest protections against further commercialization. Opening even limited corridors to new hotel development sets a concerning precedent and contradicts the Study's own finding that existing restrictions have worked well.

4. On-Site Management/Safety Requirements for All STRs

We ask that all STRs, regardless of size, be required to follow the same safety and operational rules as hotels, including having someone on-site at all times and meeting full hotel fire and safety standards. The Study acknowledges that CSTRs often operate indistinguishably from smaller hotels and bed and breakfasts "in both appearance and function."

The proposed regulations create a two-tiered system: Hotels must have "customary lodging services" with on-site operators, while CSTR-S and CSTR-M operators need only be "on call and available" 24/7, with violations requiring three occurrences within two weeks before license revocation becomes possible. This creates an uneven playing field and compromises safety.

Since short-term rentals function as de facto hotels—which both the Study and common experience confirm—they should all meet the same rigorous standards. Public safety, fire protection, and neighborhood security should not be compromised based on the size or classification of a transient lodging operation. The Study documents significant noise and STR complaints concentrated in areas with high CSTR density, suggesting that the "on-call" model is insufficient for protecting neighborhood quality of life.

5. Enforcement Challenges with Size Classifications

While we appreciate the logic behind establishing Small, Medium, and Large CSTR categories to match regulations to land use impact, we remain concerned about the practical enforcement challenges this tiered system will create. The Study itself acknowledges enforcement difficulties throughout, noting that as of March 2025, there were 7,552 noncompliant listings—more than three times all licensed STRs combined.

The proposed system requires monitoring:

- Which specific units in multi-family buildings are operating as CSTR-Ms (2-4 units, not exceeding 25% of building)
- Whether buildings in CBD districts exceed the 10% or 4-unit threshold
- Whether operators are managing multiple units under a single license
- Compliance with the one-per-block rule across three different size categories
- Whether whole-home dwellings meet CSTR-L standards versus operating illegally as smaller categories

The Study notes that "concentrations of CSTR licenses that are held in single ownership and are located within and across multiple buildings create a significant land use impact," identifying eight buildings with 10 or more listings. The tiered classification system, while theoretically sound, may make it even more difficult to track and prevent such concentrations.

We recommend that the City Planning Commission work closely with the Department of Safety and Permits to develop clear enforcement protocols, technology solutions, and adequate staffing before these regulations take effect. The Study's documentation that enforcement actions spike after each new regulatory iteration suggests that without proper implementation planning, well-designed rules will fail to achieve their protective intent.

Fundamental Principle

We continue to believe that STRs—of any classification—erode the availability, affordability, safety, and general quality of life of the residential community. The Study's own data supports this concern, documenting that 67.33% of renters reported being "very concerned" about negative impacts, and 27.28% of all respondents reported that they or someone they knew had been evicted from a unit now operating as a CSTR.

The Study acknowledges that "what is difficult to reconcile is there continues to be increased redevelopment activity occurring across the City, evidenced by continued infill development and housing sales, and when comparing citywide datasets, this increased development activity does not appear to benefit the local population." This troubling finding reinforces our position that prioritizing short-term lodging over long-term residential use fundamentally weakens our city.

We also note with alarm the significant and continuing increase in hotels throughout the CBD and historic neighborhoods such as the Marigny. While we understand the necessity of the tourism economy, any device that can encourage long-term residential use versus short-term use strengthens the livability of the city and helps retain our sense of community, our culture, and our authenticity—the very qualities that make New Orleans worthy of preservation and attractive to visitors.

As the Study itself states: "Community character is not only reflected in buildings and streetscape, but also made of the people who permanently live, work, and call New Orleans home." Without permanent residents, there is no authentic New Orleans to experience or preserve.

Louisiana Landmarks Society stands ready to work with the Commission, City Council, and community stakeholders to refine these recommendations in service of preserving New Orleans' residential neighborhoods, historic character, and authentic community fabric.

Thank you for your consideration.

Sincerely,



Sandra Stokes
Chair of Advocacy
Louisiana Landmarks Society
225-445-3800

Outlook

Fw: Objection to short term rentals at 1201 Canal

From Rachael Berg <rberg@nola.gov>
Date Mon 12/1/2025 6:33 PM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

From: CPCINFO <CPCINFO@nola.gov>
Sent: Monday, December 1, 2025 6:29 PM
To: Rachael Berg <rberg@nola.gov>
Subject: Fw: Objection to short term rentals at 1201 Canal

From: Carl Davis <w8wz@aol.com>
Sent: Monday, December 1, 2025 4:31 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Objection to short term rentals at 1201 Canal

Good afternoon,

I am a condo owner and resident at 1201 Canal and I write now to inform you of my opposition to this property being authorized for any kind of short term rental activity.

Like the majority of my neighbors in this building, I do NOT want to live in a building full of air bnb guests. If I wanted to live like that I would move into a hotel.

Thank you for considering my concerns. I can be reached via email if you have any questions

Thank you!!
Carl Davis
1201 Canal apt 406
NOLA 70112

Sent from my iPhone

Outlook

Fw: 1201 Canal Street.

From Rachael Berg <rberg@nola.gov>
Date Mon 12/1/2025 6:33 PM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

From: CPCINFO <CPCINFO@nola.gov>
Sent: Monday, December 1, 2025 6:29 PM
To: Rachael Berg <rberg@nola.gov>
Subject: Fw: 1201 Canal Street.

From: Debera Beasley <deberabeasley@gmail.com>
Sent: Monday, December 1, 2025 5:04 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: 1201 Canal Street.

My husband and I own our condo. He has lived here for about 12 years. We are elderly now and we are pleading with you to not make it short term rentals. We want to continue living here for as long as we are living.
Sincerely,
Cesar and Debbie Lombana. Unit 273.
Sent from my iPhone

Outlook

Fw: Opposition to Corporate Short Term Rentals in 1201 Canal Street Condominiums and in downtown New Orleans in General

From Rachael Berg <rberg@nola.gov>
Date Mon 12/1/2025 6:33 PM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

From: CPCINFO <CPCINFO@nola.gov>
Sent: Monday, December 1, 2025 6:28 PM
To: Rachael Berg <rberg@nola.gov>
Subject: Fw: Opposition to Corporate Short Term Rentals in 1201 Canal Street Condominiums and in downtown New Orleans in General

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From: Cynthia Robidoux <cgrobidoux@aol.com>
Sent: Monday, December 1, 2025 3:19 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Opposition to Corporate Short Term Rentals in 1201 Canal Street Condominiums and in downtown New Orleans in General

To whom it may concern,
I am a resident in Unit 270 at 1201 Condominiums. We are strongly urging you to not allow Commercial Short Term Rentals in our building in particular but also in the general downtown area. For myself and my neighbors, having anything of that sort in a mixed building, where we have owners and renters who are trying to LIVE in the building, along with strangers coming and going with no oversight is unimaginable. Please focus more on affordable housing in this area, not something that supports corporate greed. This city has plenty of places for people to stay as it is, we don't need to create special circumstances for "certain" companies to make money off of the backs of this city's constituents.

Cynthia Robidoux
cgrobidoux@aol.com

Outlook

Re: Please ban and revoke CSTRs

From Tara Lambeth <TaraLambeth@Desire-Line.com>
Date Mon 12/1/2025 3:03 PM
To Rachael Berg <rberg@nola.gov>

Received, thank you!

From: Rachael Berg <rberg@nola.gov>
Sent: Monday, December 1, 2025 1:55 PM
To: Tara Lambeth <TaraLambeth@Desire-Line.com>
Subject: Fw: Please ban and revoke CSTRs

Another one. This one is just in the e-mail itself, not in a PDF.

From: Alyssa R White <Alyssa.White@nola.gov>
Sent: Monday, December 1, 2025 1:55 PM
To: Rachael Berg <rberg@nola.gov>
Subject: FW: Please ban and revoke CSTRs

Saved to the G-drive.

Let me know if you need anything else.

Best,

Alyssa R. White (she/her)
Senior City Planner | New Orleans City Planning Commission
Office of Business and External Services
1300 Perdido Street, 7th Floor | New Orleans, LA 70112
(504) 658-7025 (office) | Alyssa.White@nola.gov

Please be advised that all email correspondence is subject to the state's public records laws.

From: DL Lane <lesanddionne@yahoo.com>
Sent: Monday, December 1, 2025 1:00 PM
To: CPCINFO <CPCINFO@nola.gov>
Cc: ryan@faubourmarigny.org; Eleanor S. Burke <esburke@nola.gov>; Short Term Rental <STR@nola.gov>; helena.morena@nola.gov
Subject: Please ban and revoke CSTRs

Hello,
I have written to you many times before. I live in the 2100 block of North Rampart St, which used to be a quiet street, full of neighbors. Unfortunately, the mostly residential street was zoned commercial decades ago and has recently been destroyed by out of state investors. Six

of the nine single family homes on my block (plus another around the corner) have been purchased by out of state owners and turned into CSTRs.

Saxony Holdings LLC owns 5 of these homes (2112 N Rampart, 2118 N Rampart, 2130 N Rampart, 2132 N Rampart and 1000 Elysian Fields) and have legally turned it into a hotel with little oversight. They have no lobby and no employees on site. Their workers repeatedly block my and my neighbor's driveways even though there plenty of open and legal spots in front of the hotel. Their cleaning lady even got in an argument with a tow truck driver when he attempted to tow her car, claiming that we don't use our driveway.

Saxony has had STR, constuction and/or HDLC violations on house after house (they own many more around the city too, including the French Quarter), but have gotten a slap on the wrist every time. Last I heard had they an unpaid fine for overbooking rooms, (which they did for years and I would consider a major safety violation), but every time they apply for a permit (now with the help of Zach Smith), it gets approved. Last I saw they are also planning on building more buildings in the backyard, which will make our block even worse. The street is absolutely disgusting with rats, trash and needles. I have lived here 11 years and it has never been so bad. Their yard people blow all the dirt, trash and plant debris from their property all over our cars and houses, when they could easily sweep it up. They trashed people's cars and sprayed concrete dust all over when they installed the pools and when they added a waterline in the street, which also had multiple violations on that permit. The owner has followed me and harassed me because I took a picture of the house from across the street.

Even though Saxony is out of state and I have never seen any signage on or near their property before, they had Freddie King signs up for the last election. I have been at meetings with Mr. King in the past and explained how my block has been destroyed.

These are luxury hotels and they went to the tax commission and had their property taxes lowered to far less per square foot than the homes in the area, even homes that are in poor condition. So they are not even paying their fair share of the property taxes. The cost of living has gone insane and CSTRs are making it even worse. If you care about locals at all, you must take corrective action.

We have almost no neighbors left. 2125 N Rampart was turned into a CSTR after Saxony moved in and they have done all the same things: trashed the street, construction, HDLC and STR violations, etc.

2127 is also a CSTR that I believe is operating without a permit, but they don't seem to cause much trouble and if they were forced out, then Saxony would just have another house.

Mags also has STRs, which they rent for $25 a night and attracts crime and drug dealers.

And then there's The John, Wifey's (formerly Iggy's) and the parking nightmare that Jamnola is creating.

Please DO NOT allow these businesses to be "grandfathered in". Their long history of violations alone should be enough to revoke their licenses. My block is the perfect example of why CSTRs are not appropriate for any part of New Orleans. My home, when it is sold, is now only useful to them and if you don't put a stop to this, the remaining three homes on my block will eventually become a hotel too. If you grandfather them in, but block future homes from being turned into CSTRs/hotels, my home now has no resale value because no one would want to live here. The right choice is a complete ban on CSTRs and hotels in former single family homes. Please stop putting out of state interests ahead of the people that live here.

Thank you,
Dionne Lane

GARDEN DISTRICT ASSOCIATION

December 1, 2025 *Via Email: CPCinfo@nola.gov*

New Orleans City Planning Commission
c/o Mr. Robert D. Rivers, *Executive Director*
1300 Perdido Street, 7th Floor
New Orleans, LA 70112

RE: Transient Lodging Study Recommendations

Dear City Planning Commission Members,

On behalf of the membership and Board of Directors of the Garden District Association (GDA) we appreciate the opportunity to submit comments regarding the subject study. We have reviewed the study and offer the following input:

(1) The GDA is very much supportive and will adamantly work to maintain the prohibition of STRs and Bed and Breakfast uses within the boundaries of St. Charles Avenue, the downriver side of Jackson Avenue, the center line of Magazine Street, and the downriver side of Louisiana Avenue as currently written in Section 20.3.LLLI.i of the CZO.

The GD is one of a few neighborhoods in the county that has a collection of historically significant 19th century structures in a small geographical space that still serve as residential homes making it a living museum. We already welcome over 5 million visitors each year according to our tourism commission. We cannot handle any more pressure and maintain this national landmarked treasure. Allowing any type of transient lodging in the neighborhood diminishes its historic value.

(2) We are opposed to allowing Bed and Breakfast uses by right in residential neighborhoods. These are commercial businesses and should be scrutinized more closely with the Conditional Use process.

(3) We are opposed to allowing any hotels/motels in the HU-B1 zoning district and specifically Magazine Street. Magazine Street is unique and filled with amazing small, locally owned businesses. We need to strive to maintain its unique character and support the local businesses. Further, we are opposed to allowing any type of ancillary uses in the small hotel/motel designation of 20 rooms or less as outlined in the study.

Thank you for allowing the GDA to provide our input. We appreciate your time in serving on the CPC.

Sincerely,

Shelley Landrieu

Shelley Landrieu
Executive Director

Garden District Association
P.O. Box 50836 | New Orleans, LA 70150-0836
(504) 525-7608 | (504)335-2262 fax | gardendistrictno@bellsouth.net

Outlook

Fw: Public comment on transient lodging study

From Rachael Berg <rberg@nola.gov>
Date Mon 12/1/2025 6:33 PM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

From: CPCINFO <CPCINFO@nola.gov>
Sent: Monday, December 1, 2025 6:28 PM
To: Rachael Berg <rberg@nola.gov>
Subject: Fw: Public comment on transient lodging study

From: GARY KEENE <keene41@aol.com>
Sent: Monday, December 1, 2025 4:42 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Public comment on transient lodging study

City Planning Commision,
I am requesting you to stop CSTRs in NOLA. These corporations are tearing up the fabric of our society in New Orleans. 1201 Canal Street developers are trying to have CSTRs Soin the building where we purchased our condo. This will turn our homes into a hotel.Their attempt to get an exemption to the permitting process made local news and outrage by the city council, They are not the only developers that say they are building long term housing but they try to make more money by having CSTRs which hurt our community.
Reading the Study, I have concerns please do not approve their recommendations. These recommendations will bring more damage to our neighborhoods by pricing out full-time residents just to enrich corporations.
* Developing THREE different corporate STR licenses, such license sub-types are impossible for the Department of Safety and Permits (DSP) to confirm and regulate, which has already been a central problem in existing enforcement around transient lodging, meaning the guest limitations across these subtypes will go unenforced.
* Allowing any unstaffed transient lodging unit to have up to 20 guests will exacerbate existing CSTR issues of noise, trash, violence, and "party house" use. The existing limit of 10 guests has proven untenable for long-term neighbors.
* The recommendation is to protect **current short-term rentals and lodging businesses** by grandfathering them in, ensuring they can keep operating **even where new rules like limiting rentals to one per block,would otherwise restrict them. There should not be any expansion of CSTRs but there should in reality be a contraction and less of them allowed.**

If these developers want to be in the hotel business, they should physically build a hotel and not be infringing on full-time residence by putting CSTRs where they don't belong.

Please do not allow this to happen! I live here, it's my home

Gary Keene
1201 Canal St Apt 265
NOLA 70112
504-452-9521

Outlook

Fw: CSTR study

From Rachael Berg <rberg@nola.gov>
Date Tue 12/2/2025 8:30 AM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

I think this is the last one

From: Robert D. Rivers <rdrivers@nola.gov>
Sent: Tuesday, December 2, 2025 8:23 AM
To: Rachael Berg <rberg@nola.gov>
Subject: Fw: CSTR study

FYI

From: Julie Jones <jjones1@uno.edu>
Sent: Monday, December 1, 2025 3:59 PM
To: Robert D. Rivers <rdrivers@nola.gov>; cpcinfo@nola.gob <cpcinfo@nola.gob>
Subject: CSTR study

Dear Mr. Rivers,
I am writing to assure you and the CPC board members that the document sent to you by Nancy Eleanor Graham has the full approval of the board (of which she is a member) of Neighbors First for Bywater. We agree that CSTRs are not compatible with any residential neighborhoods and that City enforcement based on size of building, number of units and number of visitors is totally inadequate. We urge the CPC to “just say no” when it comes to CSTRs.
Thank you as always,
Julie Jones, President
Neighbors First for Bywater.

NOTICE: This message, including all attachments transmitted with it, is intended solely for the use of the Addressee(s) and may contain information that is PRIVILEGED, CONFIDENTIAL, and/or EXEMPT FROM DISCLOSURE under applicable law. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or use of the information contained herein is STRICTLY PROHIBITED. If you received this communication in error, please destroy all copies of the message, whether in electronic or hard copy format, as well as attachments and immediately contact the sender by replying to this email or contact the sender at the telephone numbers listed above. Thank you!

Outlook

Fw: Public Comments regarding the Transient Lodging Study

From Rachael Berg <rberg@nola.gov>
Date Mon 12/1/2025 6:34 PM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

From: CPCINFO <CPCINFO@nola.gov>
Sent: Monday, December 1, 2025 6:31 PM
To: Rachael Berg <rberg@nola.gov>
Subject: Fw: Public Comments regarding the Transient Lodging Study

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From: Kim Keene <kimkeene19@gmail.com>
Sent: Monday, December 1, 2025 3:34 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Public Comments regarding the Transient Lodging Study

City Planning Commision,
I am requesting you **do NOT allow Corporate Short Term Rentals in housing with full-time residents.** 1201 Canal Street Developers are trying to have STRS in the building where we purchased our condo. This will turn our homes into hotels. Their attempt to get an exemption to the permitting process made local news and outrage by the city council, They are not the only developers that say they are building long term housing but they try to make more money by having STRs which hurt our community. Reading the Study, I have concerns please do not approve their recommendations.
* Developing THREE different corporate STR licenses, such license sub-types are impossible for the Department of Safety and Permits (DSP) to confirm and regulate, which has already been a central problem in existing enforcement around transient lodging, meaning the guest limitations across these subtypes will go unenforced.
* Allowing any unstaffed transient lodging unit to have up to 20 guests will exacerbate existing CSTR issues of noise, trash, violence, and "party house" use. The existing limit of 10 guests has proven untenable for long-term neighbors.
* The recommendation is to protect **current short-term rentals and lodging businesses** by grandfathering them in, ensuring they can keep operating **even where new rules like limiting rentals to one per block,would otherwise restrict them.**

Please do not allow this to happen! I live here, it's my home

Kim Keene
504-289-5135

1201 Canal Street Unit 265
New Orleans, LA
KimKeene19@gmail.com
https://www.linkedin.com/in/kimkeene/

Outlook

Re: Public Comment regarding transient lodging study

From Tara Lambeth <TaraLambeth@Desire-Line.com>
Date Mon 12/1/2025 3:49 PM
To Rachael Berg <rberg@nola.gov>

Received, thank you!

From: Rachael Berg <rberg@nola.gov>
Sent: Monday, December 1, 2025 3:48 PM
To: Tara Lambeth <TaraLambeth@Desire-Line.com>
Subject: Fw: Public Comment regarding transient lodging study

---

From: Kim Keene <kimkeene19@gmail.com>
Sent: Monday, December 1, 2025 3:42 PM
To: Jenna D. Burke <Jenna.Burke@nola.gov>; Rachael Berg <rberg@nola.gov>
Subject: Public Comment regarding transient lodging study

City Planning Commision,
I am requesting you **do NOT allow Corporate Short Term Rentals in housing with full-time residents.** 1201 Canal Street Developers are trying to have STRS in the building where we purchased our condo. This will turn our homes into hotels. Their attempt to get an exemption to the permitting process made local news and outrage by the city council, They are not the only developers that say they are building long term housing but they try to make more money by having STRs which hurt our community. Reading the Study, I have concerns please do not approve their recommendations.
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Please do not allow this to happen! I live here, it's my home

--
Kim Keene
504-289-5135
KimKeene19@gmail.com

https://www.linkedin.com/in/kimkeene/

Outlook

Fw: Transient Lodging Study -Comments from Margaret Walker

From Rachael Berg <rberg@nola.gov>
Date Mon 12/1/2025 2:00 PM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

And another!

From: Alyssa R White <Alyssa.White@nola.gov>
Sent: Monday, December 1, 2025 1:58 PM
To: Rachael Berg <rberg@nola.gov>
Subject: FW: Transient Lodging Study -Comments from Margaret Walker

Saved to the G-drive.

Let me know if you need anything else.

Best,

Alyssa R. White (she/her)
Senior City Planner | New Orleans City Planning Commission
Office of Business and External Services
1300 Perdido Street, 7th Floor | New Orleans, LA 70112
(504) 658-7025 (office) | Alyssa.White@nola.gov

Please be advised that all email correspondence is subject to the state's public records laws.

From: Margaret Walker <margaretawalker14@gmail.com>
Sent: Monday, December 1, 2025 1:02 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Transient Lodging Study -Comments from Margaret Walker

I am Margaret Walker and live 1526 Pauger St. in the Faubourg Marigny. I am pleased that we are working on the Commercial STR regulations and appreciate all your efforts.

I live in the neighborhood where investors have come in and bought up whole street (St. Anthony St. 1000, 1100 blocks) they are STR's and one investor who had a neighbor complained about him building another 6 unit STR on the street told her in a letter he did not care what she thought because his partner are lawyers. The street is zoned Commercial. There are already 5 whole house STRS there.

The 2100 block Rampart is now all STRS, The last real neighbor moved out they could not handle all the parties. Rampart is zoned commercial. HERE are some examples:

https://www.airbnb.com/rooms/904479479131277990 -2118 Rampart 25-XSTR-34971,

https://www.airbnb.com/rooms/28053231 2112 Rampart Same #25-XSTR-34971

https://www.airbnb.com/rooms-2027 Rampart 25-NSTR-12259

No real neighbors so no one to complain...

Here are a couple of my thoughts.

Personally, I would prefer NO COMMERCIAL STR'S. But I am not sure that is possible.

Therefore…
*No grandfathering in.
*Someone must be on the property when the guests are there.
* No keyless entry
* We need to define Hostels
I am waiting to see the suggestions from the report tomorrow.

Thank you for your time,

Sincerely,

Margaret Walker
1526 Pauger St. NOLA 7116

MargaretaWalker14@gmail.com

Outlook

Fw: Comments on the Transient Lodging Study

From Rachael Berg <rberg@nola.gov>
Date Mon 12/1/2025 6:33 PM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

From: CPCINFO <CPCINFO@nola.gov>
Sent: Monday, December 1, 2025 6:28 PM
To: Rachael Berg <rberg@nola.gov>
Subject: Fw: Comments on the Transient Lodging Study

From: MICHAEL DUPLANTIER <duplantier@bellsouth.net>
Sent: Monday, December 1, 2025 4:46 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Comments on the Transient Lodging Study

Dear CPC:

The Transient Lodging Study is another significant step forward in seeking to frame a permanent and comprehensive public policy response to the continuing problems with transient lodging, in all of its forms.

As a 30+ year resident of CBD-5 downtown, I have witnessed the growth and proliferation of hotels in this zoning district, despite what was thought to be the sufficiently protective device of conditional use for hotels proposed for the district. In reality, conditional use has been little more but a speed bump in the administrative approval process, with almost all such applications approved by the CPC staff, the CPC and ultimately the City Council. On at least a few of such applications, we have observed that upon approval of the hotel application, the applicant re-designated the intended use as effectively that of a short term rental facility, or arguably a variant of a standard hotel, including a virtual lobby and something less than the standard or required staffing, security and life safety requirements.

Layered on top of the hotel conundrum for the district is the rapid and scattershot growth of STR throughout the neighborhood over the past several years. The STR units have rendered some blocks as serving almost entirely transient residents. While the mixed use downtown neighborhoods have not gotten the attention as has been given to

other upriver and downriver neighborhoods, the fundamental nature and impact of the transiency remains the same for the downtown residents.

This flawed application process has left CBD-5 with unpredictable land use for such proposals, violative of the spirit if not the letter of the statutory goal of CBD-5, that of a mixed use, less intense neighborhood more conducive to small business and residential occupancy. As a result, we have seen a decline in residency in the Lafayette Square district, a downtown neighborhood that was the fastest growing in the city in the 2010 decennial census.

We understand that downtown hotel and transient uses are entrenched and will not go away, but we request that in CBD-5 the CPC seek to craft a finely tuned proposal that will primarily and carefully seek to retain and protect the nuanced mixed-use balance for the district that had been achieved prior to hotel growth and transient residency, and limit the transient uses in a manner that is consistent with that desired balance. The scales have long begun to tip the wrong way, so it is incumbent on the CPC and the City Council to put its hands on the scale to restore that proper balance in favor of the permanent residents.

Michael Duplantier

820 Baronne Street

Outlook

Fw: Key Concerns Regarding the CPC Study on Short-Term Rental Policy Viability

From Rachael Berg <rberg@nola.gov>
Date Mon 12/1/2025 6:34 PM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

From: CPCINFO <CPCINFO@nola.gov>
Sent: Monday, December 1, 2025 6:30 PM
To: Rachael Berg <rberg@nola.gov>
Subject: Fw: Key Concerns Regarding the CPC Study on Short-Term Rental Policy Viability

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From: Mitchell Conroy <mitchellrconroy@gmail.com>
Sent: Monday, December 1, 2025 3:25 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Key Concerns Regarding the CPC Study on Short-Term Rental Policy Viability

Dear Members of the City Planning Commission,

I am writing to share several high-level concerns regarding recent considerations to policies to the Comprehensive Zoning Law of the City of New Orleans. While the most recent study makes an effort to address long-standing issues related to transient lodging, its recommendations raise serious questions about enforcement feasibility, neighborhood impacts, data integrity, and the overall prioritization of real-estate investment over community livability.

The study proposes three new commercial short-term rental (CSTR) license types differentiated by size and guest capacity, with the largest category permitting up to 20 overnight guests across seven bedrooms without any on-site staff. These capacity-based distinctions are not realistically enforceable by the Department of Safety and Permits—an agency that already faces well-documented challenges confirming occupancy, monitoring transient lodging activity, and enforcing existing guest limitations. If DSP cannot meaningfully regulate current CSTR operations, expanding allowable capacities will only accelerate issues with noise, trash, nuisance behavior, violent incidents, and “party house” environments.

The City’s existing cap of 10 guests per unit has already proven insufficient for long-term neighbors, and doubling that limit for unstaffed properties will intensify those impacts.

The study frames increased property values as an expected “benefit” of expanded short-term rental activity. This perspective overlooks a core reality: rising property valuations translate directly into higher tax burdens for long-term residents and further erode affordability in neighborhoods already facing displacement pressures. The primary beneficiaries of escalating valuations are investors and owners who treat housing as a financial asset—not the residents who rely on stability and affordability to remain in their communities.

While the study recommends long-overdue protections in neighborhoods like the Bywater and Marigny, it simultaneously opens the door for expanded CSTR use in other areas—despite acknowledging that short-term rentals grow wherever they are allowed. Neighborhoods such as Tulane-Gravier and Central City were previously assumed to be insulated from aggressive STR growth due to lower tourist demand. Yet data shows they have already experienced significant STR proliferation, particularly in MU-1 and MU-2 zones—precisely the areas where the study now recommends additional commercial STR permissions.

The study suggests that all existing CSTRs and currently permitted transient-lodging uses should be allowed to remain—even in cases where they do not meet the new recommended standards, such as limiting CSTR presence to one per square block.

However, city law is clear that permits do not confer permanent land-use rights, and a prior Eastern District Court ruling affirmed there is no inherent property right to operate STRs. Automatically grandfathering in thousands of currently non-compliant uses would entrench existing inequities and severely limit the City's ability to implement more sustainable models.

The study's recommendation to permit additional hostel development in certain neighborhoods—including the Marigny, already oversaturated with CSTRs—raises further concerns. When asked, the City and CPC were unable to provide clear rules governing hostels. This lack of definition creates an obvious loophole: developers could simply label transient lodging projects as "hostels" to circumvent otherwise applicable restrictions.

The study acknowledges that CSTR owners were overrepresented by a factor of at least five in its data collection, though available information suggests the overrepresentation may be closer to eight-fold. Moreover, these figures assume that every respondent who identified as an STR owner represents a unique property holder—but in reality, a large portion of CSTRs are concentrated among a small group of actors.
Advocates have reported participating in focus groups with known owners who did not self-identify as such to the study team, suggesting that the true degree of bias is even more pronounced. With no guarantee that survey respondents accurately disclosed their status, the resulting dataset cannot be considered an impartial foundation for policy recommendations.

One example of this structural bias occurred when focus group participants were asked how the City should accommodate future transient-lodging demand—even though the assumption of such demand was driven by the already skewed survey results. By presenting CSTR-owner-heavy feedback as a general consensus that subsequent participants were expected to accept, the study embedded a pro-investment, pro-STR stance into its process from the outset.

In summary, the study, while comprehensive in scope, appears to rely on unenforceable licensing structures, flawed assumptions about community benefit, neighborhood-uneven development strategies, undefined loopholes, and data collection methods that disproportionately reflect the interests of CSTR owners rather than residents. For a policy area that profoundly affects housing stability, neighborhood character, and long-term affordability in New Orleans, we must ensure that recommendations are grounded in sound data, equitable considerations, and realistic enforcement mechanisms.

Thank you for your attention to these concerns. I urge the Commission to revisit the study's assumptions, methodology, and proposed framework to ensure that any future policy safeguards the wellbeing, affordability, and long-term viability of New Orleans' neighborhoods.

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From the desk of:

Mitchell R. Conroy
4516 St. Ann Street, New Orleans, LA 70119
Cell: (856) 246-8120

Executive Summary

Community Response to the City's Transient Lodging Study

Submitted by: Eleanor Graham, Neighbors First for Bywater

Date: December 1, 2025

Purpose

This Executive Summary provides a community-based overview of concerns and recommendations regarding the City's Transient Lodging Study, focusing on the impact and regulatory future of Commercial Short-Term Rentals (CSTRs) in New Orleans neighborhoods.

Key Findings

1. The Study's Conclusions and Recommendations Conflict with Its Own Data.

The Study does not demonstrate public demand, necessity, safety, or business justification for CSTRs in residential areas. Its recommendation to retain CSTRs in any neighborhoods contradicts evidence showing residents overwhelmingly prefer a prohibition or stricter limits on CSTRs. Its recommendation to retain CSTRs as a transient lodging category is nonsensical legally and for zoning ordinance inclusion since caselaw already deems NSTRs to be commercial. Also,the proposed regulatory scheme for CSTRs is too complex and unworkable.

2. CSTRs Are Incompatible with Residential Neighborhoods.

CSTRs function as commercial lodging businesses like hotels and have been shown to disrupt neighborhood peace, reduce housing availability, and increase nuisance, traffic, and safety complaints.

3. Enforcement Gaps Undermine the proposed Regulatory Framework.

The City's Department of Safety & Permits has not effectively enforced CSTR legal requirements, resulting in illegal CSTR activity and ongoing noncompliance.

Legal and Policy Considerations

CSTR permits do not create vested property rights under the law and should not be renewed where legislation has eliminated or restricted them. "Grandfathering" for CSTRs contradicts CZO zoning principles and public-welfare goals.

Community Recommendations

- **Eliminate CSTRs as a legal short-term rental category;**
- **Do not renew existing CSTR permits after their expiration per new legislation;**
- **Remove all references to CSTRs from the CZO and City Code;**
- **For short-term rental lodging uses regulate neighborhood STRs (NSTRs) only with strict operator requirements while rented and density restrictions;**
- **Update other transient lodging use categories such as hostels and restrict their operation to appropriate zones like hotels and motels;**
- **Simplify B&B regulations and reduce their guest limits;**
- **Ensure hotels/motels operate only in appropriate zones.**

Legislative Amendments Needed

1. **Revise CZO Article 20.3LLL;**
2. **Eliminate Article 20.3LLL.2;**
3. **Delete CSTR provisions in Article XI of the City Code.**

Conclusions

CSTRs should not be retained as a short-term rental or transient lodging use category. They should not be allowed in New Orleans neighborhoods or citywide after expiration of their permits. Eliminating CSTRs, continuing to strengthen NSTR oversight and lodging density restrictions, and refining hotel/motel, hostel, and B&B regulations will protect and strengthen neighborhoods and improve housing availability.

To: City Planning Commission of the City of New Orleans

Through: Bob Rivers, City Planning Commission Executive Director, rdrivers@nola.gov

From: N. Eleanor Graham,
Board Member, Neighbors First for Bywater
Member, Strong Coalition (housing advocacy coalition of neighborhood leaders)
Advocate for Saxony Condominium resident homeowners (Bywater)

Date: December 1, 2025

Memorandum to City Planning Commission
Regarding Transient Lodging Study

On behalf of my Bywater neighborhood, Neighbors First for Bywater, and my fellow permanent homeowners and residents of the Saxony Condominiums (900 Bartholomew Street), I submit this memorandum to address the Desire Line Transient Lodging Study (sometimes referred to as "the Study") primarily as it pertains to Commercial Short-term Rentals (CSTRs). Because of my prior legal experience as an Assistant and Deputy City Attorney for the City of New Orleans for land use and zoning matters, and now as a Bywater neighborhood advocate, this memorandum sets forth an analysis which includes legal case authorities and my CSTR-related experiences while living in Bywater. It also contains brief opinions about the Study's proposals for other transient lodging uses. It concludes with a final legislative proposal to remove CSTRs as a transient lodging category that would align with applicable law, simplify the Comprehensive Zoning Ordinance (CZO), and promote predictable order and proper stewardship of land use that is expected of a zoning ordinance.

POSITION I: Retention of CSTR as a separate category of short-term rental or a transient lodging option is not supported by the Transient Lodging Study's findings, numerous negative citizen experiences with CSTRs and City administration of them, and current law.

POSITION II: Under current law existing CSTRs should not remain as temporary, legal nonconforming uses.

Position I. CSTRs should not be located in any New Orleans neighborhoods.

I.(i) The Transient Lodging Study appropriately concludes that historic residential and mixed-use neighborhoods in Bywater and Marigny should not have permitted CSTRs due to their negative "high impact." However, the Study's same "impact" analysis - high, moderate, and low - does not warrant the Study's proposed retention or increase of CSTRs in other New Orleans neighborhoods. By using its ascribed categories of CSTR impact on neighborhoods,

Desire Line inappropriately diminishes the weight of serious citizenry experiences about CSTRs in other negatively impacted neighborhoods, the prevalence of residential short-term rentals (NSTRs) throughout the City, and data showing that (i) complaints rose as STR density increased and (ii) hotel/motel capacity and projected growth adequately support tourism. Also, while presuming that CSTRs are a justifiable transient lodging classification, the Study seeks to strike a balance to address a conflict of different perspectives about CSTRs (generally, CSTR owner/operators versus impacted residents) with a regulatory framework that would expand CSTRs in certain neighborhoods. **However, again, the Study disregards its own data which does not support an effort to strike a balance between different perspectives about CSTRs by more regulation of CSTRs. To the contrary, regardless of whether residents are homeowners or renters, the Study's data shows that the majority want illegal CSTRs stopped, their residential areas to stay residential, availability of housing, and for CSTRs to be treated like hotels. No reported data supports CSTRs as contributing to the public welfare, health, or safety of New Orleans in positive numbers or accounts that would outweigh deference to citizen opposition to the perpetuation of CSTRs in any neighborhood.** Consequently, Desire Line improperly proposes the retention of CSTRs as a separate short-term rental category and a permitted transient lodging option in some neighborhoods regardless of concurrent NSTR density, numerous neighbors' complaints about CSTRs, data showing sufficient hotel/motel capacity and growth to support tourism, and the significant history of CSTRs operating illegally except when the City recently held an online rental platform accountable (apart from City enforcement efforts for which there is no reliable data).

Additionally, the Study's proposed regulatory framework for CSTR size categories, use standards, and locations would be unworkable, unnecessarily complicate the (CZO), which begs to be simplified, and would not promote the public welfare or safety. Patent from the Study's efforts is an approach to treat CSTRs as a form of transient lodging that warrants continued existence, could be efficiently regulated, and is worth continued permitting in numerous City areas despite documented harms of CSTRs to residents' quality of life, a history of CSTR regulatory violations that have gone unenforced, shocking domination of CSTRs in areas that were residential or warranted residential development (see Bywater examples in (ii) below), and excessive STR numbers per capita when considering the snapshots of historical data showing total permitted and reportedly illegal STRs in the City of New Orleans as compared to other cities. Despite this known backdrop, the Study proposes to categorize CSTRs' building sizes and guest limits but does not even require that they all have onsite operators or management while rented, a void that would continue to perpetrate violations, put property owners and other individuals at safety risk, and hamper City enforcement efforts. The Study also recommends a one-per block CSTR limit that does not correlate with proposed sizes or guest limits for CSTRs or account for current density limits for NSTRs that are not excepted and B&Bs. Additionally, the Study poses the need for a CSTR enforcement mechanism when it is unrealistic to presume that the City has or will have in the near future the financial means, staffing or organization that realistically could administer and enforce CSTR permits under the Study's complicated scheme in addition to its other zoning and transient lodging permitting

duties. For example, it is common knowledge from data generated by Strong Coalition and other investigative media outlets that the New Orleans has not successfully limited CSTR permits to 25% in buildings with a certain unit number and in specified areas despite the 2019 legislative change. It is also common knowledge that the City's One Stop App records are replete with unenforced citizen complaints about illegal CSTR operations, including excessive guest numbers, regardless of neighborhood. In Bywater our neighborhood advocates also have experienced a number of instances where City officials were even confused about whether the density limit precluded a proposed B&B or NSTR, causing delay, additional expense and great amounts of time on the part of applicants and neighborhood advocates. Personally, as delineated below, I and my neighbors have experienced numerous instances of unresolved CSTR challenges with City officials that have dragged on for years. (See part (ii) below.) **Given serious, documented CSTR-related impacts and challenges which Bywater and other neighborhoods have experienced, New Orleans should not adopt more of the same regulatory efforts to retain CSTRs and further complicate the CZO, particularly given the prevalence of NSTRs and hotels/motels which are demonstrating satisfaction of our tourist market.**

I.(ii) Experiences and the law do not support retention of CSTR as a permitted transient lodging category in New Orleans.

I.(ii.a.) My experiences with the concomitant growth of NSTRs and CSTRs in Bywater and stalled efforts to obtain regulatory compliance through the City's Department of Safety & Permits have confirmed that CSTRs not only have no place in neighborhoods, but cannot be regulated efficiently. Whether CSTR use is permitted in a structure that was intended to be or could be a family home or multifamily dwelling, their negative impact has been profound.

I offer three Bywater case examples, which I know anecdotally are similar to homeowners' experiences in other neighborhoods, to support my position.

First, my Bywater home in The Saxony Condominiums, a 75-unit 100% residential condominium building, is governed by a restrictive regime with a recorded declaration prohibiting commercial uses in the building. Despite this restrictive covenant the City's Department of Safety & Permits has issued CSTRs for Saxony units since June of 2019 based on erroneous representations by the developer and some subsequent unit owners that The Saxony is a "mixed-use" building when it is actually a residential building with a restrictive covenant located in a historic mixed-use zone.[1] The One Stop App confirms

[1] In accordance with well-established land use law the City of New Orleans lawfully exercises its power to control land use through zoning. But a private covenant governing a residential condominium or other HOA development, which prohibits a commercial use that is otherwise allowed by the City's liberal zoning district within which that development exists, creates a parallel governance. The more restrictive parallel governance of the condominium declaration or covenant primes the City's zoning, precluding the developer and owners from using their residential property for commercial use. While the City's police power may apply a liberal zoning classification such as "mixed use" to a restrictively-governed parcel in the liberal

that while the City denied some CSTR permit applications for first floor units based on such misrepresentation by the developer, the City nonetheless proceeded to issue 69/75 CSTR permits to the developer for all other units before it ever sold a unit. Despite numerous complaints of serious CSTR-related nuisances, crimes, property damage, and illegal operations in The Saxony by myself and other resident homeowners[2], and my recent notification to the City of its history of erroneously-issued permits, the City has not corrected the erroneous CSTR permits in this building (21 as of last count). (See attached recent example of Saxony CSTR-related emails; and see also, City Code of New Orleans, Chp. 26, Section 624(d) authorizing the City to cancel or rescind a permit that was issued in error, on the basis of inaccurate or misleading information, or contravenes the applicable law.) Moreover, for less than a handful of numerous complaints have Saxony condominium owners received any written responses from the city; and the city only held one hearing against the developer after over five years of complaints.

Second, across from The Saxony is a development of 10 single-family homes that were proposed for residential subdivision and construction as "Bywater Residencies" in 2015 (see attached documents for Zoning Docket 005/15 at City Planning Commission and later the City Council). Despite this representation and the corresponding waivers and conditional use conditions that allowed all these homes to be built without adding parking but adding pools, they were never sold to families but permitted as CSTRs after passage of the 2016 and 2019 CSTR ordinances, offering up to 10 guests per home or 100 guests total if fully occupied. Further, the city's Department of Safety & Permits granted CSTRs for all 10 homes without any recorded verification that the owner or successors had complied with all conditional use conditions, including notable ones that were never fulfilled - repair of damaged sidewalks, removal of previous curb cuts, and planting of trees on Bartholomew Street. See One Stop App; and compare with the attached City Planning Commission and City Council documents for this development.

Third, at 3513-21 Chartres, in 2022 three buildings with the appearance of modern homes but intended to be used for CSTRs were built (each positioned in a configuration like a front/rear duplex with separate front/rear entrances), allowing for up to 10 guests per unit. The LLCs that own the "Bywater Residences" and Chartres homes include Frank and Dan Glaser who founded and are executives with the short-term rental company Stay Heirloom, which operates CSTRs citywide. Each of these three Bywater properties has open violations from complaints, including excessive guests, now numbering dozens in One Stop. **The city has continued to reissue CSTR permits for all three Bywater property developments, including The Saxony residential condo building,**

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zoning district, its police power does not extend to authorization of a commercial use of that parcel because of the restrictive covenant that runs with the land and precludes its owners from commercial use. Hence, in these situations, City permits that are issued based on developer or owner representations that the building is "mixed-use" or "commercial use" are deemed invalid or erroneous and are not enforceable as a proper exercise of the City's police power.

[2] Saxony homeowners have called the police department and reported property damage crimes to cars in the secured garage and units and disturbances by STRs when no operator management would respond; and they also called the Fire Department twice for incidents that would have caused great damage without Fire Department intervention, including breaking down the door of a CSTR unit. Because of the coded doors to the building and the garage that are disseminated to CSTRs, and numerous individual CSTR operations without any onsite management, the Saxony has remained vulnerable to serious CSTR impacts.

despite numerous complaints and recorded open violations, and even recommendations for adjudication - contrary to the City Code Section 26-625 prohibition that the department "shall not issue or renew a permit if there are open violations." See, One Stop App.

I.(ii.b.) The applicable law does not support retaining CSTRs as a separate category of short-term rental or transient lodging in New Orleans based on the Study.

The law authorizes the City to regulate commercial use of property, even exclude its commercial use, when the legislation's objective is reasonable and supported by a rational relationship to the stated objective. In the governing decision of Hignell-Stark v. City of New Orleans, 46 F. 4th 317 (5th Cir. 2025)(issued in October 2025), the federal Fifth Circuit Court of Appeals followed this legal principle originating in U.S. Supreme Court cases. **It also upheld the City of New Orleans' broad authority to regulate residential property proposed for short-term rental to transients (NSTRs), and deemed that use not only to be commercial but more analogous to a hotel rather than a traditional lease that would be incidental to homeownership.** These conclusions are supported by well-settled Louisiana case law and federal district court case law. See, Deslonde v. St. Tammany Parish, 391 So.3rd 706, 716 (La. App. 1st Cir. 2024)(upholding broad authority of a city to enforce short-term rentals; and characterizing short-term rental of property as a strictly commercial use); Craig v. City of New Orleans Board of Zoning Adjustments (903 So.2d 530, 537 (La. App. 4th Cir. 2005)(finding that stays on a weekly or nightly basis are "fully commercial lodging"). **Moreover, the federal Fifth Circuit Court of Appeals in Hignell-Stark v. City of New Orleans (2025) determined that former NSTR permit holders in New Orleans did not establish a vested property interest in their short-term rental permits that was necessary to prevail on their arguments of violations under the U.S. Constitution when the City no longer issued NSTRs for their properties. See also, Bodin v. City of New Orleans, C.A. 25-329 (E.D. La., September 8, 2025)(STR owners had no fundamental right implicated by the City's STR regulations)). Applying the caselaw's construction of short-term rentals of residential property in New Orleans as a commercial use akin to hotels, a separate category for CSTR under our CZO is thus legally nonsensical. Moreover, elimination of CSTRs as a transient lodging category makes practical sense for legislative consideration given prior moratoria to address CSTR proliferation and the necessity for existing block-based density limitations for NSTRS not subject to exception and Bed and Breakfasts, apart from any CSTR considerations.**

Position II. Under the law because CSTR permits do not vest a property right for their owners, they should not be renewed beyond their expiration should legislation effectively eliminate or prohibit CSTR use citywide or in specific areas.

The Transient Lodging Study proposes that CSTRs which have been issued in areas where the Study also recommends future CSTR prohibition

(e.g., Bywater and Marigny) be "grandfathered." In sum, the Study recommends that regardless of recommended future CSTR prohibitions, CSTR permits in the prohibited areas should be renewed as long as their properties remain active CSTRs. This "grandfathering" proposal has no legal justification, and should be disregarded by the Commission and City Council. Recent cases with rulings that sided with most of the City's positions in STR litigation, Hignell-Stark, *supra*, and Bodin v. City of New Orleans, Civil Action. 25-329 (E.D. La. 9/18/2025)(District Judge Jay Zainey) show that NSTRs do not have vested property rights in their NSTR permits allowing use of their property for a specific commercial use based on Louisiana state law because Louisiana does not vest such rights in temporary commercial permits. Given this caselaw and other legal rationale finding that NSTRs function like commercial uses akin to hotels, it logically follows that CSTRs do not have vested property rights in their CSTR permits. Furthermore, in Hignell-Stark the Appeals Court's reasoning acknowledged a STR Ordinance clarifying statement against construing the continued use of any property for short-term rental should the City modify its short-term regulations to restrict or prohibit the issuance of a STR. Also, cited by this same Court and well known to the Commission is CZO Section 25.3.C, providing that the temporary, intermittent or illegal use of land or structures does not establish and maintain the existence of a nonconforming use. **Accordingly, applicable caselaw supports the treatment of CSTRs as what they are - commercial enterprises operating like hotels with temporary permits that do not vest property rights. Absent any vested property rights in CSTR permits and the Study's proposed prohibitions of them in historic districts and elsewhere there is no legal justification for their continued renewal under the "grandfathering" scheme presented by the Study.**

No doubt CSTR owners and operators have argued to Desire Line and would continue to argue to retain their lodging classification and "grandfather" their permits despite any future areas of CSTR prohibition in order to avoid economic losses and to maintain projected investment returns. These arguments should not carry the day in the Commission's or City Council's legislative approaches to the nagging problem of CSTRs because the courts have consistently determined that property owners in New Orleans have no vested right to commercial short-term use of their property. Furthermore, CSTR permit holders would not be deprived of all economic value or investment use of their property should CSTR permitting be eliminated as a transient lodging use where they own CSTR properties. They would retain the rights to lease their properties month-to-month or longer-term, sell them, or potentially renovate and convert them to another allowable use. They also would have the option to use their investment capital in hotel/motel franchises or partnerships or housing developments with tax incentives. **On the other hand, should the City in its future CSTR legislation fail to adhere to a legal construction that treats temporary commercial use permits as privileges rather than rights, it risks perpetuating havoc on its citizens' welfare and safety in favor of economic speculation for a few.**

III. Other opinions regarding B & Bs, hotels, and hostels.

III.a. Bed and Breakfasts

The Study's proposal for elimination and streamlining Bed and Breakfasts provisions in the CZO is welcome and long overdue. There is no reason for the CZO to have principal and ancillary Bed and Breakfasts when a single set of regulations could accomplish the same objective. The proposed limit of 5 bedrooms is also a welcome recommendation since it aligns with a suggestion of some of our NFB Board Members.

III.b. Hotels

We agree that hotels/motels should be clearly and consistently defined in the city Code and CZO with the current requirement for their 24/7 onsite management. Hotel/motel use should be regulated strictly and not allowed by permission or conditional use in the historic neighborhoods (i.e., Treme, Vieux Carre, Marigny, and Bywater) due to current density of B&Bs, hotels, and STRs. **They also should not be permitted or allowed as conditional uses on the Elysian Fields or St. Claude/Poland corridors where they would be situated adjacent to historic cottages or other historic buildings, homes, or other family dwellings. Instead, property owners in these areas should provide classic neighborhood businesses or renewed investment in struggling or blighted business properties to support the adjacent neighborhoods. Development sites that propose a mix of hotel/motel and residential use, regardless of the proposed site's zoning, should be regulated by use requirements for separate entrances, elevators/stairwells, and separate management. Hotels/motels should not be allowed to sell residential units in the hotel/motel area of a mixed-use development.**

III.c. Hostels

Hostels require clear, simple definition with use standards, guest limits, and mandatory 24/7 onsite management, particularly considering that they offer lodging without private sleeping quarters. The Study offers a definition that needs further refinement and may be informed by zoning ordinances in cities with greater numbers of hostels. The study also proposes to permit hostels in a number of historic mixed-commercial, institutional campus, industrial, and business districts, indicating their treatment like hotels that warrants further scrutiny. **Hostels should not be located in current or future historic zoning districts where they would be situated adjacent to historic cottages or other historic buildings, homes, or other family dwellings. Additionally, in areas where the underlying zoning purpose is to support housing (regardless of the precise zoning district designation), but commercial lodging or density of other uses has impacted the availability of housing, density limits of hotels and hostels should be considered. Alternatively, to support housing efforts in these high-impact areas, hotels and hostels should be allowed only as conditional uses with a specific disallowance for their construction adjacent to historic**

cottages or other historic buildings, homes, or other family dwellings. Controlling density and potential site-specific development of hotels and hostels that would negatively impact nearby dwellings or predominantly residential areas regardless of their site-specific zoning should be a priority to enhance the pedestrian-oriented urban core and thus promote walkable, bike-friendly residential living and working and preserve potential barriers that would allow urban watersheds and/or buffer lower-zoned commercial/industrial areas.

PROPOSED LEGISLATION

The simple solution to resolve CSTR impacts is the best solution - rescission or repeal of the 2016 and 2019 CSTR legislation (and the current IZD that allows consideration of new CSTR permits only through a conditional use process) with effective dates and sunset provisions for permits to allow for smooth property use transitions.

Regardless of how the City Council would couch its future CSTR legislation, the ordinance should be one that removes CSTRs as a category of STR for land use control because:

(i) under the law there is no legal distinction between the CSTRs and NSTRs;
(ii) elimination of the CSTR transient lodging category would resolve the negative impacts of CSTRs' intrusion in all 52 districts where they are permitted;
(iii) elimination of the CSTR transient lodging category would prevent their future expansion and negative impacts citywide;
(iv) elimination of the CSTR category would streamline the city's administration and enforcement of all STR permits for transient lodging to a more manageable level and simplify all STR permitting and enforcement processes without the administrative burden of complex regulations, including the time consuming and often exploited conditional use process; and
(v) elimination of the CSTR category would motivate CSTR owners to pivot their CSTR investments to other uses that would promote the public good.

The CSTR legislation also should provide not only for an effective date of the Ordinance, but the date(s) when the Department of Safety & Permits would not receive or issue CSTR permits, a date when all CSTR permits would be deemed void, and the use of property for CSTR after that date would not be allowed subject to penalties for illegal operation of a business with appropriate references to the CZO and City Code supporting enforcement action by the city administratively or in civil or municipal court. The language for this change should be clear that the city will not allow more permitting for them after these dates expire, and thus relieve city officials

from the flood of CSTR renewal applications under the disfavored "grandfather" argument per current law. Additionally, the Ordinance would need to include mandates for the legislative modifications to the City Code and CZO STR regulations where CSTR was deemed a category of STR. The actual proposed legislative effect in the CZO would be to:

1. Revise CZO Article 20.3.LLL.1 to eliminate all references to CSTRs, and ideally change references to NSTRs to STRs (or simply short-term rentals);
2. Eliminate CZO Article 20.3.LLL.2; and
3. Eliminate the provisions in Article XI of the City Code pertaining to CSTRs.

/s/ *N. Eleanor Graham*
Nancyeg57@gmail.com

Ms. Jordan and Mr. Macnamara:

As a follow-up to voicemail messages for Mr. Macnamara, I am writing on behalf of 32 resident homeowners in The Saxony Condominiums to advise that: (1) the City has relied upon inaccurate information or misrepresentations about The Saxony Condominiums declared use and erroneously issued Commercial Short-term Rental Permits (CSTRs) for 69 of the 75 exclusively residential units in The Saxony dating back to June 6, 2019; and (2) currently, the City erroneously issued or renewed 21 CSTR permits in The Saxony - all based on the same inaccuracy that it is a "mixed-use" building. The impacted units as of today are: 204, 206, 209, 210, 214, 215, 217, 305, 307, 308, 309, 318, 406, 411, 415, 420, 421, 505, 510, 520, and 521.

The below, embedded (and recorded) documents for The Saxony Condominiums show that **this entire building's declared principal use was and remains entirely single-family residential** (see, e.g., Declaration, pp. 19-21 prohibiting business uses in the condominiums except home occupations, limiting any short-term use as ancillary to the principal residential use, and providing for lease restrictions in the 2017 Declaration and its attachments). Despite this restrictive condominium document, which has always governed The Saxony's residential use per the Louisiana Condominium Act, **on May 15, 2019 and periodically thereafter to the present the developer and some subsequent owners applied for and received CSTRs by misrepresenting or inaccurately representing this building as a "mixed-use" building. Misrepresentations or inaccurate applications are evident for 69 units (all on floors 2-5) in the City's One Stop App. Only for first-floor units 101-106 did any City official realize that the developer or subsequent owners had misrepresented the building's use and then deny CSTR applications and at least one business license for those units. (See One Stop App for these 6 units.)** Based on the historical and ongoing misrepresentations perpetrated by the developer (Burgundy JEJ LLC) and some owners/operators for upper-floor units in The Saxony, any current CSTRs should be revoked or rescinded due to inaccurate or misleading information pursuant to City Code of New Orleans, Chapter 26-624(d). Moreover, the City must cease issuing erroneous CSTRs in our exclusively residential building. Finally, as I have requested, due to the ongoing confusion that the developer and others have caused by their numerous, erroneous CSTR applications, only one City zoning official should be assigned to review applications for CSTRs or other proposed commercial uses in this building, and ensure that they are denied.

Respectively submitted,

N. Eleanor Graham



Recorded Condo Declaration - Saxony...
9.4 MB



Saxony Condo First Amendment.pdf
2.5 MB

Sent from my iPad

6. **ZONING DOCKET NO. 5/15 - 800 BARTHOLOMEW STREET DEVELOPMENT, LLC**

Brief:
Requesting a Conditional Use to permit thirteen single-family residences in an LI Light Industrial District, on Square 242, Lots A, C, D, D-2, 8, 9, and 10 (proposed Lots N, O, P, Q, R, S, T, U, V, W, X, Y, and Z), in the Third Municipal District, bounded by Burgundy, Bartholomew, Alvar, and Dauphine Streets (Municipal Addresses: **832-840 Bartholomew Street** and **831-835 Alvar Street**). The recommendation of the City Planning Commission being **"FOR APPROVAL"**, subject to five (5) waiver and six (6) provisos.

Annotation:
(Cn. Ramsey, Cn. Deadline 3/31/15).
APPROVED. ***See Motion No. M-15-91.***

Ord. Adopted April 9, 2015
Ord. No. 24,356

MOTION

NO. M-15-91

CITY HALL: February 26, 2015

BY: COUNCILMEMBER RAMSEY

SECONDED BY: COUNCILMEMBER HEAD

BE IT MOVED BY THE COUNCIL OF THE CITY OF NEW ORLEANS, That the report and favorable recommendation of the City Planning Commission on **ZONING DOCKET NO. 5/15 – 800 BARTHOLOMEW STREET DEVELOPMENT, LLC –** Requesting a Conditional Use to permit thirteen single-family residences in an LI Light Industrial District, on Square 242, Lots A, C, D, D-2, 8, 9, and 10 (proposed Lots N, O, P, Q, R, S, T, U, V, W, X, Y, and Z), in the Third Municipal District, bounded by Burgundy, Bartholomew, Alvar, and Dauphine Streets (Municipal Addresses: **832-840 Bartholomew Street** and **831-835 Alvar Street**), be, and the same is hereby upheld, and the request is granted, subject to five (5) waivers and six (6) provisos as stated in the City Planning Commission's report.

BE IT FURTHER MOVED, That a copy of the report of the City Planning Commission and of this motion be forwarded to the City Attorney's Office for the preparation of an ordinance to effectuate the request.

THE FORGOING MOTION WAS READ IN FULL, THE ROLL WAS CALLED ON THE ADOPTION OF THEREOF AND RESULTED AS FOLLOWS:

YEAS: **Brossett, Cantrell, Guidry, Head, Ramsey, Williams - 6**

NAYS: **0**

ABSENT: **Gray - 1**

AND THE MOTION WAS ADOPTED.

THE FOREGOING IS CERTIFIED
TO BE A TRUE AND CORRECT COPY
Lora W. Johnson
CLERK OF COUNCIL

G:\DoCS\NAOMI\COUNCIL\LANDUSE MOTIONS\2015\M-15-91.docx

ORDINANCE

CITY OF NEW ORLEANS

CITY HALL: March 12, 2015

CALENDAR NO. 30,658

NO. 026356 MAYOR COUNCIL SERIES

BY: COUNCILMEMBER RAMSEY NMR

AN ORDINANCE to provide for the establishment of a Conditional Use to permit thirteen single-family residences in an LI Light Industrial District, on Square 242, Lots A, C, D, D-2, 8, 9, and 10 (proposed Lots N, O, P, Q, R, S, T, U, V, W, X, Y, and Z), in the Third Municipal District, bounded by Burgundy, Bartholomew, Alvar, and Dauphine Streets (Municipal Addresses: 832-840 Bartholomew Street and 831-835 Alvar Street); and otherwise to provide with respect thereto.

WHEREAS, **Zoning Docket Number 5/15** was initiated by 800 Bartholomew Street Development, LLC and referred to the City Planning Commission; and

WHEREAS, the City Planning Commission held a public hearing on this zoning petition and recommended approval of the conditional use in its report to the City Council dated January 26, 2015, presented in **Zoning Docket Number 5/15**; and

WHEREAS, the recommendation of the City Planning Commission was upheld and the changes were deemed necessary and in the best interest of the City of New Orleans and were granted approval, subject to five (5) waivers and six (6) provisos, as stated in Motion Number M-15-91 of the Council of the City of New Orleans on February 26, 2015.

SECTION 1. THE COUNCIL OF THE CITY OF NEW ORLEANS HEREBY ORDAINS, That a Conditional Use to permit thirteen single-family residences in an LI Light Industrial District, on Square 242, Lots A, C, D, D-2, 8, 9, and 10 (proposed Lots N,

O, P, Q, R, S, T, U, V, W, X, Y, and Z), in the Third Municipal District, bounded by Burgundy, Bartholomew, Alvar, and Dauphine Streets (Municipal Addresses: 832-840 Bartholomew Street and 831-835 Alvar Street); is hereby authorized and approved, subject to the following waivers and provisos, as specifically set forth herein:

WAIVERS:

1. The developer shall be granted a waiver of Article 4, Section 4.9.7 - Table 4.1 *Height, Area and Bulk Requirements for RM-2 Multiple-Family Residential District* of the Comprehensive Zoning Ordinance, which sets a minimum lot area for a single-family development at 3,125 square feet to permit lot areas of 2,094 square feet and 2,304 square feet for Lots 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30 and 31.

2. The developer shall be granted a waiver of Article 4, Section 4.9.7 - Table 4.1 *Height, Area and Bulk Requirements for RM-2 Multiple-Family Residential District* of the Comprehensive Zoning Ordinance, which sets a minimum lot width of 30 feet to permit a lot width of twenty-four (24) feet for Lots 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, and 31.

3. The developer shall be granted a waiver of Article 4, Section 4.9.7 - Table 4.1 *Height, Area and Bulk Requirements for RM-2 Multiple-Family Residential District* of the Comprehensive Zoning Ordinance, which sets a minimum lot depth of 90 feet to permit a lot depth of 87'3" for Lots 20, 21, 22, 23, 28, 29, 30 and 31.

4 The developer shall be granted a waiver of Article 4, Section 4.9.7 - Table 4.1 *Height, Area and Bulk Requirements for RM-2 Multiple-Family Residential District* of the Comprehensive Zoning Ordinance, to permit a front yard depth of zero feet (0').

5. The developer shall be granted a waiver of Article 15, Section 15.2.1 Table 15.A of the Comprehensive Zoning Ordinance which requires the provision of twelve (12) off-street parking spaces to permit zero (0) off-street parking spaces on the site.

PROVISOS:

No person shall use any of the properties described herein or permit another to use any of those properties described herein for the use authorized by this ordinance, unless the following requirements are met and continue to be met:

1. The Department of Safety and Permits shall issue no building permits or licenses for this project until final development plans are approved by the City Planning Commission and recorded with the Office of Conveyances. Failure to complete the conditional use process by properly recording plans within a one year time period or failure to request an administrative extension as provided for in Article 16, Section 16.9.11 of the Comprehensive Zoning Ordinance will void the conditional use approval.
2. The developer shall provide revised site, floor, and elevation plans to reflect the proposed development of twelve (12) parcels as proposed in Subdivision Docket 158-14.
3. The resubdivision of property that will facilitate the proposed development shall be completed and recorded prior to the recordation of Conditional Use application in the Office of Conveyances.
4. The developer shall obtain a Certificate of Appropriateness from the Historic District Landmarks Commission for the proposed development, which shall be submitted to the staff of the City Planning Commission prior to final approval of the Conditional Use.

5. The developer shall submit revised site plans which shall indicate the type, size and placement of street trees along the Bartholomew Street right-of-way, subject to the review and approval of the Department of Parks and Parkways.

6. The developer shall close the existing curb cuts on Bartholomew Street and repair any damage to the sidewalks and curbs subject to the review and approval of the Department of Public Works. The plans approved by the Department of Public Works shall be submitted to the staff of the City Planning Commission prior to final approval of the Conditional Use.

SECTION 2. Whoever does anything prohibited by this Ordinance or fails to do anything required to be done by this Ordinance shall be guilty of a misdemeanor and upon conviction shall be subject to a fine or to imprisonment or both, such fine and/or imprisonment set by Section 1-13 of the 1995 Code of the City of New Orleans, or should alternatively be subject to whatever civil liabilities, penalties or remedies the law may prescribe. Conviction shall be cause for the immediate cancellation of the Use and Occupancy permit of the premises.

SECTION 3. This ordinance shall have the legal force and effect of authorizing this conditional use only after all the provisos listed in Section 1 of this Ordinance which impose a one-time obligation have been completely fulfilled and complied with, and only after all the provisos listed in Section 1 which impose a continuing or on-going obligation shall have begun to be fulfilled, as evidenced by the Planning Commission's approval of a final site plan, on or before one year from the date of adoption of this ordinance, (which shall be incorporated into this ordinance by reference) and its subsequent recordation, and no use or occupancy certificates or permits (other than the building permits needed to fulfill the provisos) shall be issued until all the provisos which impose a one-time obligation have been completely fulfilled

and complied with, and only after all the provisos listed in Section 1 which impose a continuing or ongoing obligation shall have begun to be fulfilled, as evidenced by the Planning Commission's approval of a final site plan (which shall be incorporated into this ordinance by reference) and its subsequent recordation. If the development or construction of the conditional use authorized herein is not commenced within one (1) year from the date this ordinance becomes law, as contemplated by Section 3-113 of the Home Rule Charter of the City of New Orleans, the provisions of this Ordinance shall be null, void and of no legal force and effect.

ADOPTED BY THE COUNCIL OF THE CITY OF NEW ORLEANS APR 09 2015

Jason Williams
VICE PRESIDENT OF THE COUNCIL

DELIVERED TO THE MAYOR ON APR 13 2015

APPROVED: [redacted] APR 16 2015

MITCHELL J. LANDRIEU
MAYOR

RETURNED BY THE MAYOR ON APR 17 2015 AT 9:05 AM

LORA W. JOHNSON
CLERK OF COUNCIL

ROLL CALL VOTE:

YEAS: Brossett, Gray, Guidry, Ramsey, Williams - 5

NAYS: 0

ABSENT: Cantrell, Head - 2

THE FOREGOING IS CERTIFIED
TO BE A TRUE AND CORRECT COPY

Aisha Collier
ASSISTANT CLERK OF COUNCIL

cityofno.granicus.com

ACTION: APPROVE
VOTE: 6-0
YEAS: ALEXANDRA MORA, KELLY BROWN, KYLE WEDBERG, ROBERT STEEG, NOLAN MARSHALL III, PAMELA BRYAN
NAYS: NONE
ABSTAINING: NONE
ABSENT: ROYCE DUPLESSIS, CRAIG MITCHELL, JASON HUGHES

5. ZONING DOCKET 5/15 - Request by 800 BARTHOLOMEW STREET DEVELOPMENT, LLC for a Conditional Use to permit thirteen single-family residences in an LI Light Industrial District, on Square 242, Lots A, C, D, D-2, 8, 9, and 10 (proposed Lots N, O, P, Q, R, S, T, U, V, W, X, Y, and Z), in the Third Municipal District, bounded by Burgundy, Bartholomew, Alvar, and Dauphine Streets. The municipal addresses are 832-840 BARTHOLOMEW STREET AND 831-835 ALVAR STREET. (PD 7) (EA)

ZD 005-15

MOVER: KYLE WEDBERG
SECONDER: ROBERT STEEG
ACTION: MODIFIED APPROVE
VOTE: 6-0
YEAS: ALEXANDRA MORA, KELLY BROWN, KYLE WEDBERG, ROBERT STEEG, NOLAN MARSHALL III, PAMELA BRYAN
NAYS: NONE
ABSTAINING: NONE
ABSENT: ROYCE DUPLESSIS, CRAIG MITCHELL, JASON HUGHES

6. ZONING DOCKET 6/15 - Request by CITY COUNCIL MOTION NO. M-14-465 for a Zoning Change from an RD-3 Two-Family Residential District to a B-1A Neighborhood Business District, on Square 1084, Lot T, in the Third Municipal District, bounded by Magnet, North Galvez, Bartholomew, and North Miro Streets. The municipal addresses are 2128

Outlook

Fw: Concern Regarding Short-Term Rentals at 1201 Condominiums

From Rachael Berg <rberg@nola.gov>
Date Mon 12/1/2025 6:34 PM
To Tara Lambeth <TaraLambeth@Desire-Line.com>

From: CPCINFO <CPCINFO@nola.gov>
Sent: Monday, December 1, 2025 6:30 PM
To: Rachael Berg <rberg@nola.gov>
Subject: Fw: Concern Regarding Short-Term Rentals at 1201 Condominiums

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From: Russell, Shelby E <srussell@tulane.edu>
Sent: Monday, December 1, 2025 4:16 PM
To: CPCINFO <CPCINFO@nola.gov>
Subject: Concern Regarding Short-Term Rentals at 1201 Condominiums

To whom it may concern -

I am a resident of Unit 270 at 1201 Condominiums, and I want to express my strong opposition to allowing commercial short-term rentals in our building.

For those of us who call this building home, the idea of mixing permanent residents with a constant flow of strangers coming and going without proper oversight is unsettling and disruptive. Our community was built for people to live here, not for it to become a revolving door for corporate profit.

Instead of creating opportunities for companies to capitalize on our neighborhoods, I urge you to prioritize affordable housing and initiatives that truly benefit the residents of this city. There are already plenty of options for visitors to stay downtown; we don't need to compromise the integrity and safety of our homes for the sake of corporate greed.

Thank you for considering the voices of those who live here.

Best regards,

Shelby Russell Hensen (She/Her)

VIEUX CARRE
VCPORA
PROPERTY OWNERS, RESIDENTS AND ASSOCIATES

December 1, 2025

New Orleans City Planning Commission
1300 Perdido Street
New Orleans, LA 70130

Re: Comments on the Transient Lodging Study – French Quarter Findings and Recommendations

Dear Members and Staff of the New Orleans City Planning Commission,

Thank you for the opportunity to submit comments on behalf of Vieux Carré Property Owners, Residents & Associates (VCPORA) regarding the recently completed Transient Lodging Study and, in particular, its recommendations for the French Quarter. For decades, VCPORA has worked to preserve the Vieux Carré as a vibrant, viable mixed-use neighborhood. This experience has led to the following deep concerns.

The study's primary recommended changes for the French Quarter are:

- Allowing **one Medium or Small CSTR per block** in the VCE-1 district, and
- Allowing **an unlimited number of small hotels** in VCE-1.

These recommendations are not supported by the study's own findings, and they raise significant concerns about accuracy, methodology, and the long-term preservation of the neighborhood.

A. The French Quarter is incorrectly categorized as "moderately impacted"

The study classifies the French Quarter as "moderately impacted" based on STR activity, survey engagement, and 311 complaints. However, this classification narrowly focuses on permitted and nonpermitted STRs while **ignoring the overwhelming presence of existing hotels and other transient lodging uses**. This method ignores the neighborhood's deep saturation with transient uses that predate and far exceed the legal STR framework.

By this logic, the French Quarter's transient lodging impacts are considered comparable with neighborhoods such as Algiers Point and Gentilly Terrace, an assessment that is fundamentally inexplicable with on-the-ground realities. No other neighborhood in New Orleans experiences comparable commercial tourism pressure, zoning context, or historic fabric. The typology fails to reflect the true saturation of transient lodging in the Quarter.

B. The study undercounts hotels and omits hotel room density

The study identifies **43 hotels** in the French Quarter. Our analysis of the City's Hotel, Motel & B&B dataset (Data.NOLA.gov) shows **57 hotels**, a 32% higher number of hotel properties,

as well as thousands more lodging rooms than any other neighborhood in the city, except for the Central Business District. (See attached data sheet.)

This omission of room counts is a major flaw. The impact of a 250-room hotel is materially different from a 10-room inn, yet the study treats them equally. When all hotels are accurately counted, the density of transient lodging, and its cumulative impact on neighborhood, is far higher than the report suggests.

C. The study provides no analysis or rationale for expanding lodging in the French Quarter

Nowhere does the report offer a substantive justification for loosening restrictions on transient lodging in the French Quarter. In fact, its own data points toward maintaining or **tightening** the existing rules:

- The French Quarter already has one of the highest concentrations of transient lodging uses in the city.
- Enforcement is difficult and resource intensive.
- High transient density has contributed to reduced long-term housing supply.
- Survey responses overwhelmingly cite concerns about housing loss and neighborhood change.

The study even concludes that *"Of the total transient lodging uses in the French Quarter (50), most are Hotels/Motels (43, 86%); followed by Noncompliant STRs (6; 12%), and CSTRs (1, 2%). These numbers* ***suggest the current ban on new transient lodging uses in the French Quarter has been effective and limiting future development of transient lodging uses in this neighborhood may be appropriate.****"* (pg. 58 of 127) Yet their own recommendations directly contradict this statement.

The only arguments in favor of expansion come from a few stakeholder comments, primarily from commercial property interests—not from the study's own analysis. There is no evidence that more STRs or small hotels are needed, nor that they would improve conditions for the livability of the historic district.

D. VCE and VCE-1 are fundamentally different districts and should not be treated the same

The proposal to treat VCE-1 as equivalent to VCE ignores both the legislative history of the French Quarter zoning code and the long-standing purpose of these districts. VCE-1 was created as a limited, conditional expansion area during the 1990s redevelopment of the former warehouse that became the House of Blues. Its creation was explicitly tied to commitments that the upper floors would remain residential**,** preserving the mixed-use character that has defined the French Quarter for centuries. **VCE-1 was not designed to mirror the full-scale entertainment district of Bourbon Street**; rather, it was established as a smaller and less intense entertainment corridor, containing a blend of entertainment, restaurants, shops, and upper-floor apartments intended to support both residents and visitors, and to promote the renovation and rehabilitation of the aging buildings within its footprint.

VCE, by contrast, has evolved into a high-intensity entertainment district dominated by adult-use venues, round-the-clock alcohol sales, and crowds incompatible with many other commercial uses and residential life. The City Council has repeatedly acknowledged that VCE is not an appropriate model for expansion. Applying VCE level lodging permissions to VCE-1 would erase the very protections that were promised to property owners and residents when the district was created and would set a dangerous precedent for expanding transient lodging deeper into the interior commercial districts (which are historically mixed-use), like the VCC-1 and VCC-2 which still contain significant residential populations.

E. Additional transient lodging threatens the remaining residential fabric

The French Quarter has already experienced decades of housing loss due to tourism and commercial expansion. Even modest increases in transient lodging have outsized effects on:

- Housing availability and affordability
- Resident population stability
- Noise, safety, and late-night activity levels
- Pressure on aging historic buildings
- Displacement of neighborhood-serving uses

Allowing new STRs or small hotels, even "limited" or "low-scale," would accelerate these impacts and further erode the Quarter's already fragile residential base. Once allowed, commercial uses rarely contract; they expand, setting in motion the same pressures that continue to hollow out Bourbon Street and adjacent areas.

F. Other historic tourist cities are restricting, not expanding, short-term rentals

Cities across Europe facing overtourism are enacting **strict limits or outright bans** on STRs in their historic centers, including:

- **Barcelona:** Halting new licenses and phasing out tourist apartments by 2029.
- **Madrid:** Banning tourist rentals in its historic center.
- **Budapest:** Banning holiday rentals in its historic District 6 beginning 2026.
- **Florence:** Prohibiting new STRs in its UNESCO-listed historic core.

These cities recognize that tourism management policies that protect housing, livability, and historic identity require stronger, not weaker, controls on transient lodging. New Orleans should not move in the opposite direction.

Conclusion

Given the inaccuracies in baseline data, the lack of analytic justification for expansion, the purpose of the VCE-1 district, and the clear negative impact additional transient lodging would have on the residential viability of the French Quarter, we respectfully urge the City Planning Commission to:

1. **Reject any recommendation that expands lodging uses within the French Quarter, including in VCE and VCE-1.**

2. **Correct the data regarding existing hotels, STRs, and number of rooms to ensure an accurate baseline for policy decisions.**
3. **Maintain, and even strengthen, protections intended to preserve the French Quarter as a living neighborhood.**

The Vieux Carré remains a national treasure because generations of residents and policymakers have defended its livability. We ask the Commission to uphold that legacy and safeguard the future of this historic community.

Thank you for your consideration. I am available to provide further details or supporting documentation at your request.

Sincerely,



Erin Holmes
Executive Director, VCPORA
816 N. Rampart St.
New Orleans, LA 70116

FRENCH QUARTER HOTELS & RESPECTIVE ROOM COUNTS

	Business Address	Business Name	Rooms*
1	1001 CHARTRES ST	CHATEAU HOTEL	49
2	1001 TOULOUSE ST	MAISON DUPUY HOTEL	200
3	1003 BOURBON ST	LAFITTE GUEST HOUSE	14
4	1005 ST PETER ST	ST. PETER GUEST HOUSE	20
5	1006 ROYAL ST	HOTEL ROYAL	43
6	1013 ST ANN ST	CREOLE HOUSE (INN ON ST. ANN)	22
7	1024 CHARTRES ST	HOTEL PROVINCIAL	115
8	1024 ST ANN ST	MARIE LAVAEAU GUEST HOUSE (Links to FRENCH QUARTER GUEST HOUSES)	15
9	1101 N RAMPART ST	NEW ORLEANS COURTYARD HOTEL	44
10	111 IBERVILLE ST	ONE11 HOTEL	82
11	1118 URSULINES AVE	NEW ORLEANS GUEST HOUSE (CLOSED)	14
12	115 DECATUR ST	BLUEGREEN RESORTS MANAGEMENT	16
13	1234 CHARTRES ST	LE RICHELIEU	89
14	124 ROYAL ST	WYNDHAM NEW ORLEANS	374
15	131 DECATUR ST	LA GALERIE	60
16	214 ROYAL ST	MONTELEONE HOTEL	570
17	300 BOURBON ST	ROYAL SONESTA HOTEL	483
18	300 S RAMPART ST	SONDER	
19	301 DAUPHINE ST	CHATEAU LEMOYNE ATTN: FINANCE DEPT:	171
20	316 CHARTRES ST	W FRENCH QUARTER HOTEL (Hotel de la Poste)	97
21	320 DECATUR ST	BIENVILLE HOUSE MOTOR HOTEL	83
22	329 DAUPHINE ST	GRENOBLE HOUSE	21
23	335 DAUPHINE ST	TONY'S FRENCH QUARTER ROOMS	
24	337 BURGUNDY ST	DAUZAT HOUSE	
25	415 DAUPHINE ST	DAUPHINE ORLEANS HOTEL	111
26	501 DECATUR ST	FRENCH MARKET INN (509 Decatur?)	120
27	508 CHARTRES ST	SONDER (St. Helene Closed)	32
28	509 DAUPHINE ST	AUDUBON COTTAGES (Historic French Market Inn)	126
29	541 BOURBON ST	FOUR POINTS BY SHERATON FRENCH QUARTER	186
30	555 CANAL ST	NEW ORLEANS MARRIOTT HOTEL-[H/P]	1,333
31	612 ST PHILIP ST	ST. PHILIP FRENCH QUARTER APARTMENTS	18
32	616 URSULINES AVE	HOTEL VILLA CONVENTO	35
33	621 ST LOUIS ST	OMNI ROYAL ORLEANS HOTEL	345
34	623 CANAL ST	AVANTSTAY THE HALEQUIN	20
35	623 URSULINES AVE	HAUNTED HOTEL ON URSULINES-HOTEL	15
36	625 ST ANN ST	PLACE D'ARMES HOTEL	67
37	708 URSULINES AVE	INN ON URSULINES (Closed?)	15
38	717 BARRACKS ST	ROYAL BARRACKS GUEST HOUSE	7
39	717 CONTI ST	HOTEL LE MARAIS	66
40	717 ORLEANS AVE	BOURBON ORLEANS HOTEL	252

41	730 BIENVILLE ST	HOTEL MAZARIN	102
42	730 DUMAINE ST	FRENCH QUARTER MANSION BOUTIQUE HOTEL	9
43	739 CANAL ST	ASTOR CROWN PLAZA NEW ORLEANS	693
44	800 IBERVILLE ST	HYATT FRENCH QUARTER	254
45	828 TOULOUSE ST	OLIVIER HOUSE HOTEL	42
46	830 CONTI ST	PRINCE CONTI HOTEL	76
47	835 BOURBON ST	BON MAISON GUEST HOUSE	6
48	905 ROYAL ST	905 ROYAL HOTEL (NINE-O-FIVE)	10
49	910 IBERVILLE ST	COURTYARD NEW ORLEANS DOWNTOWN/IBERVILLE	230
50	911 BURGUNDY ST	HOTEL ST PIERRE	77
51	915 ROYAL ST	CORNSTALK HOTEL (CLOLSED)	14
52	919 ROYAL ST	ANDREW JACKSON HOTEL	21
53	920 N RAMPART ST	BEST WESTERN FRENCH QUARTER LANDMARK HOTEL	102
54	924 GOVERNOR NICHOLLS ST	1822 BOUGAINVILLEA HOUSE	2
55	931 CANAL ST	THE SAINT HOTEL	71
56	100 IBERVILLE ST	WESTIN	462
57	827 TOULOUSE ST	HOTEL ST MARIE	103
		Total rooms counted	**7604**

Data Sources:

Licensed Hotels,Motels & B&Bs

https://data.nola.gov/City-Finance-and-Budget/Hotels-Motels-BBs/ns2v-hzec/about_data

Room Counts

https://www.successfulmeetings.com/Meeting-Event-Venues/New-Orleans/Hotels?pg=14

https://www.myneworleanshotels.com/en/all-hotels/

Note on highlighted properties:

While the riverside of Canal St. and hotels in the first 100 block of cross streets are zoned as CBD-2, they fall within the geographic definition of the Vieux Carre National Register Historic District, and all describe themselves as situated in the French Quarter.