

Water Collaborative of Greater New Orleans

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

Vol. 2 Ch. 1 – Office of the Mayor

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

Vol. 2 Ch. 5 – Housing NOLA

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

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

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

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

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

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

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

Vol. 2. Ch. 6 – Louisiana Landmarks Society

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

Vol. 2. Ch. 7 – ENONAC

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

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

Vol. 2. Ch. 7 – NOLA Squared

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

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

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

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

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

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

Vol. 2. Ch. 7 – Office of the Mayor

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

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

Vol. 2. Ch. 9 – Office of the Mayor

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

Vol. 2. Ch. 10 – Office of the Mayor

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

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

Vol. 2. Ch. 11 – Office of the Mayor

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

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

Vol. 2 Ch. 11 – Central City Renaissance Alliance

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

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

Vol. 2 Ch. 11 – Port of New Orleans

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

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

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

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

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

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

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

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