

Paul Cramer

From: Jay Seastrunk <jay.seastrunk@icloud.com>
Sent: Monday, January 09, 2017 1:44 PM
To: Paul Cramer; Leslie T. Alley; CPCinfo
Cc: Susan G. Guidry; Stacy S. Head; LaToya Cantrell; Patty Gay; slstokes@earthlink.net
Subject: Public Comment > Master Plan Amendments 2016-2017

Below are my comments on the Mayor's Office Proposed Text of new FLUM Categories:

I am completely opposed to the gutting of the original master plan language which with great neighborhood and community input was to preserve the current character and use of our neighborhoods. This wholesale replacement of the goals of the master plan with a white paper generated in the vacuum of the Mayors' office with little broad public comment or input is inappropriate and a wholesale political sell out of the original Master Plan that was formed with significant and broad community input.

1. I especially oppose the proposal to "Eliminate all residential unit densities in all Future Land Use Categories" We have significant quantities of historic housing that are based on one and two family units (low density) – and have been designated as such for decades. We also have some single family residential areas which have been designated as such for decades. To eliminate a direct relationship between residential unit densities and future land use categories (such as one and two family with low density) provides too much flexibility to politicians to change our neighborhoods in ways that most constituents of one and two family neighborhoods are opposed to. The Master Plan was created to provide stability and predictability as well as the rule of law (true equity – not equal outcomes or results) – in practice it has done anything but that, especially with dramatic modifications such as these being proposed by "leadership". I consider this proposal to be a direct threat to the historic one and two family residential neighborhoods of Uptown New Orleans which are a vital part of its historic success as a resilient livable city. In my view this proposal is contradictory to the stated goals of resiliency.
2. I find "allow storm water management / mitigation as a primary use" lacking in description, outcome, and intended result. What does this mean? Does it mean pervious parking lots become an allowable primary use because they allow water to permeate through them? This needs more objectively defined criteria with an explanation of its merits, benefits, and possible negative consequences before it should even be considered as an amendment.
3. I find "Consider increasing allowable density and uses in areas of higher elevation and lower flood risk" to be a direct threat to the historic one and two family residential neighborhoods of Uptown New Orleans and oppose it.
4. Not unlike item 2 above I find "Incorporate built environment risk reduction and adaptation into the "Development Character" of all Future Land Uses to be poorly defined, with none of its benefits and negative impacts stated/defined for evaluation.
5. I find creation of Residential Mixed-Density Suburban a threat to our one and two family neighborhoods – we have more than adequate supply of undeveloped property in a wide range of areas of the city of New Orleans – there is no need to compromise through change existing suburban one and two family residential neighborhoods by mixing in a variety of other uses and densities in with them.
6. I find merging of Mixed-Use Low Density and Mixed-Use Medium density a threat to mixed use low density areas of the city and the low density residential districts adjacent to them. This is all being thrown around without appropriate discussion of what current safeguards are provided by Mixed use low density zoning districts that are not available in mixed use medium density. Again this appears to allow too much flexibility and not enough protection to the currently designated lower density areas.

7. For the reasons discussed above I oppose merging residential single family post war, residential low density post war, and residential multi family into one new category called Residential Mixed-Density Suburban lacking in safeguards and protections for one and two family neighborhoods.

Volume 2 Chapter 1 Vision:

1. Equity sounds wonderful but I find it disingenuous at best to be proposing all of these amendments that gut the protections currently offered to low density residential neighborhoods when none of the residents of these low density neighborhoods have been queried or involved in the proposal of the amendments that will dramatically change what is allowed to be constructed in their neighborhoods – so by its very process the current Master Plan Amendment cycle is creating inequity because the residents of the neighborhoods with the most dramatic change proposed are not at the table and are not being heard by the Administration, City Planning Commission, & Council and in fact are barely informed of what kind of changes are in store. So the inclusion of the word Equity is laughable given this. Be it the recent forcing of short term rental commercial activity into residential neighborhoods or the current Master Plan cycles gutting of protections to one and two family residential districts as of now the tax paying long term residents of low density neighborhoods are the underserved and underrepresented whose participation is not occurring in the changes being brought to their neighborhoods – most constituents are not even aware of the details of the change that is proposed much less the real world potential effects – that IS NOT EQUITY, this is 180 degrees in opposition to the Master Plan effort that occurred immediately after Katrina and I would say is even attempting to undo it.
2. The statement box on Equity does not adequately describe the planning means at the cities disposal of “eliminating income and neighborhood inequities” – how does the city propose to do this? Before this statement box is added to the master plan it is critically important to quantify what tools are available to achieve this within the realm of planning, which tools have a proven track record of success, and which tools are supported by the majority of residents in the planning districts effected by their implementation – anything less than this is once again not equitable because it is representing the needs of one group over the needs of another without any input from the groups most effected. Based on the amendments submitted it would appear the city proposes to eliminate income and neighborhood inequities by gutting successful low density neighborhoods through allowing them to be densified then controlling how this added density is injected (via a prejudiced political process) as opposed to allowing capitalistic market forces to control development. It appears that the city wants to eliminate income and neighborhood inequities through economic interference which in the end will make all of the city’s neighborhoods average and simultaneously eliminate the unique qualities that make existing neighborhoods strong. This kind of political interference is a proven destructor of success and value in the detritus of social experiments in city planning that have been foist upon citizens over the decades only to be leveled as failures and replaced with plans there are poorly thought out and quickly implemented with their only mantra being good intentions. Name one successful example in any city of planning and zoning practices that have eliminated income inequity and not destroyed value at the same time?
3. Remove equity from the Resilience box – goals are stronger when they are not intermixed but instead are clearly stated and stand on their own. By stating that “Equity” is the driving force behind our cities economic growth the Resilience box has essentially been hijacked by the equity box above it.

Volume 2 Chapter 5 Admin:

- Under section 2 Goal it appears the term Equity defined as being fair and impartial is being confused with the word equal which is defined as the state of being the same in quantity, size, degree or value (identical, uniform, alike). It is fundamentally unfair to those who live in neighborhoods and areas with high levels of market activity and high home prices in one and two family districts to suddenly and radically inject multi-family affordable housing opportunities in their neighborhood using “all tools available” – this is clearly favoring one group (affordable housing customers) over other groups (tax paying long term owners of improved property in successful neighborhoods where they have invested their blood sweat and tears) This is not equity but theft by government reallocation.

Volume 2 Chapter 6 Admin:

- The posted document has incomplete edits that are not visible in the pdf due to formatting – this document should be withdrawn because it is not properly posted for public comment.

Volume 2 Chapter 7 Admin:

- I am opposed to the elimination of the promotion of tree planting on private property. The trees of New Orleans are a prime asset and should be protected and encouraged. The proposed amendment eliminates the promotion of the planting of trees on private property

Volume 2 Chapter 9 Admin:

- It seems odd that under Entrepreneurship and Innovation they are replacing some statistics and updating some information but leaving other information in the document even though it is old and could certainly be updated with more recent data. Data from 2005, 2006, and 2007 could certainly be updated to reflect more recent data.
- Deleting the labor force participation information without updating it suggests this document is for show and not an accurate assessment of the current situation.
- The Administration appears to be re-authoring the entire section without much balance or independent facts being presented.
- Deleting ranking of household income is further evidence of this wholesale authorship.
- Deleting ranking of poverty rate is further evidence of this wholesale authorship.
- The posted document edit is only one page in length yet the document appears to continue to multiple pages. This is not adequately posted for review and comment and should be withdrawn.

Volume 2 Chapter 12

- As above this is attempting to inextricably cross define equity and resilience – these terms should stand on their own with no need to reference each other and this significant cross definition (equity is resilience, resilience is equity) weakens the objectivity and intent of the document especially since the ongoing theme is to put these terms in every section in some way without adequately and objectively defining what they mean in terms of outcome and result. What is ideal equity? What is ideal resilience? What is the goal and what does the goal look like in a planning and zoning perspective? Uptown New Orleans after Katrina which included all types of classifications of residence be it race or socio economic was very resilient after Katrina and it had little to do with planning and zoning, but more to do with geography and strength of one and two family neighborhoods which much of these amendments appear to be trying to dilute and eviscerate contradicting the goal of resiliency. Further please define how the current Master plan is lacking in equity before making it such a strong component of the amendments.
- The section on Resilience again appears to be breaking down in its proper use of the term by defining it as it relates to *“inequities in the distribution of environmental benefits and burdens in the city”* – WHAT DOES THIS MEAN? What is an environmental benefit and how is it unfairly distributed? By whom? To Whom? What are the current impacts of climate change on the city of New Orleans and where is the data?? Bringing the largely partisan and contentions ideas of Climate Change into the Master Plan document seems unproductive especially as it relates to a successful city. In order to include this statement in the amendments it should include what methods the city will *“link existing inequities in the distribution of environmental benefits and burdens in the city and reducing the risk for the most vulnerable populations who have the fewest resources available to mitigate the impacts of disasters and climate change”*

Volume 2 Chapter 14 Land Use:

- The suggested text placement on Equity needs more validation as it is making statements which are vague and subjective without much backup or objective criteria that define “public good”. The Equity text also does not define what an “optimal outcome” is. Before this language is inserted it is critical that the definition of what an optimal outcome is be a required part of of text – without it this becomes a basis statement for removing the rule of law from the Master Plan and turning it into a political tool for politicians to define “public good” and “optimal outcome” at their will with little public input.

- The Goal 5 “Target” has no place in this document without understanding in detail the cost benefit of doing this and who would most negatively be impacted by the high cost of doing this which would likely be those least able to afford it. This is no better illustrated by the placeholder goal of “by X in X year”
- The Goal 6 “Target investments” seems inequitable on its face because it favors some groups over others rather than equity which would be for all citizens of New Orleans.

Volume 2 Chapter 15 Neighborhood Participation Program (NPP-Program)

- This proposed text change appears to be an effort to tie the true definition of equity (fairness and impartiality) that is inherent in a well administered neighborhood participation process (which in my opinion the city of New Orleans does not currently have this MP amendment process being a case in point) to the improper use of the word equity throughout other sections of the Master Plan which imply equal outcome, equal value, equality, identical in every way. Because the term equity is being misused throughout the rest of the document I am opposed to its use in this section.
- The primary pillar of city governance should be neighbors and neighborhoods as constituents. This document is about planning and land use not city governance.
- The Neighborhood councils as originally envisioned should be implemented – the NPP process needs to be strengthened by the participation of neighborhood leaders in different and diverse neighborhood not centralized on the executive branch of the city. No reasons are given why the neighborhood councils have not been established or why they are a bad idea.
- This statement is false: “NEO has defined a notification process that initiates notification to key stakeholders (neighborhood and community leaders) with sensitivity to time schedules and calls for action.” NPP notifications are not advanced enough nor automated enough to garner significant input. The one meeting often has notices that arrive after the meeting has taken place – the information from the meeting (presentation comment etc) is not easily referenced after the meeting has occurred so individuals who could not attend can participate. Public comment process and deadlines are also not easily ascertained on a project basis and it isn’t clear that public comment is acted upon unless a politician gets involved by expressing concern.

GENERAL COMMENT:

The average citizen, myself included does not have the time to review all of these proposals and comment on each and every change much less time to proof read and edit those comments – I have picked a few which illustrate a general pattern in the majority of proposed amendments. They appear to favor vocal groups and organizations who claim to represent some constituency yet have little input from individual residents, neighbors or neighborhoods that will be impacted by the changes. I see proposals generally that appear to vest commercial rights in properties located in residential zoning districts, including properties that are no longer commercial but were at some time in the past, and proposals that appear to support providing undefined and unknown development rights to existing non-conforming properties by changing the language which favored protection of existing historic residential to language that favors re-establishment, expansion or alteration of commercial properties in residential districts with unknown limitations and controls. This is of great concern especially with regard to section 25.3.G.6 Existing nonconforming hospitals in single family or two family residential districts. As an individual I have enquired by email about how these proposed Master Plan amendments might affect zoning of existing hospitals in residential districts and have received no response.

Basically the amendments appear to favor activist interest groups at the expense of individual residents and residential neighborhoods – historically it is the strength of neighborhoods that gives strength and resilience to New Orleans – these master plan amendments appear to want to experiment with the strength of neighborhoods by creating a more homogenous planning guideline where individuality of neighborhoods in both physical and economic aspects is sacrificed for homogeneity and will provide average rather than exceptional results as the detritus of since demolished or blighted past social experiments implemented via heavy handed government planning have achieved.

Best Regards,

Jay Seastrunk

Paul Cramer

From: CPCinfo
Sent: Wednesday, November 02, 2016 1:44 PM
To: Paul Cramer
Subject: FW: Master Plan Amendment Input

-----Original Message-----

From: Keith Twitchell [<mailto:keithgct@aol.com>]
Sent: Wednesday, November 02, 2016 1:43 PM
To: CPCinfo
Subject: Master Plan Amendment Input

Dear Planning Commissioners,

I am writing to express my absolute opposition to the amendment to -- in reality, rewrite of -- Master Plan Chapter 15 (the Community Participation Plan) as submitted by the Landrieu administration via text amendment 15-03.

The proposal to place control over community participation within city government (the Neighborhood Engagement Office) is the complete opposite of national and international best practices, which universally state that meaningful community participation cannot occur within a system controlled by government. Let me say right up front that my opposition to the amendment is in no way opposition to NEO. NEO should continue to exist within a true community participation structure; its main roles would be to serve as the link between a community-based structure and city government, and to continue its current role of being part of community informing. In fact, asking it to take on the responsibilities envisioned in the proposed amendment could undermine its ability to provide the useful service it is presently providing. Already, NEO has no capacity to respond to individual neighborhoods' requests for information about specific proposals. Nor does it have the ability to do community and neighborhood association capacity-building, or to facilitate Neighborhood Participation Plan (NPP) meetings -- important aspects of creating meaningful community participation that a full blown Community Participation Program (CPP) would provide.

And New Orleans residents have repeatedly made clear that they want a formal community participation structure, beginning in 1992 with the New Century New Orleans Plan. This call has been explicitly repeated in the Unified New Orleans Plan (2006), City Charter amendment (2008), and Master Plan (2010). The City Council has also made clear that it supports this, including Council resolution R-10-412, dated October 7, 2010, and its vote during the previous Master Plan amendment process to reject the administration's attempt at that time to delete a formal community participation structure from the Master Plan.

Virtually all progressive cities in the United States have a Community Participation Program. A CPP is the best way to both promote quality economic development and protect neighborhood character. A CPP is universally recognized as the best method for creating clear, consistent communications between community and government. In turn, this builds trust in government among residents -- something that is sorely lacking in New Orleans. Finally, though by no means exhaustively, a CPP is an excellent training ground for future leaders. For example, in Birmingham (AL), two recent mayors and a majority of the City Council are former neighborhood association presidents who came up through their CPP.

The administration's argument for removing all reference to a community participation structure from the Master Plan is illogical and based on a false premise. Their argument is "we didn't do what the people wanted, therefore they don't want it." This is like saying "I didn't give you food, therefore you are not hungry." Further, all evidence -- including statements from neighborhood leaders at NEO's own Neighborhood Roundtables -- makes it clear that the community still wants a CPP.

I urge you in the strongest terms to respect the will of our community, as well as the precedent set during the previous Master Plan amendment cycle, and reject this truly terrible attempt to mute the voices of the people of New Orleans. I urge you to reject the administration's proposed amending of Master Plan Chapter 15.

Thank you for your consideration in this matter, and for the enormous amount of work you do for our city.

Regards,
Keith

I
Keith G.C. Twitchell, President
Committee for a Better New Orleans
(504) 430-2258

CBNO works to create equity and opportunity for all New Orleanians by developing community leaders, fostering civic engagement, and advocating for open, effective, accountable government. Celebrating 50 years of building community in 2016!

<<http://twitter.com/cbnonola>>

<<http://www.facebook.com/pages/Committee-for-A-Better-New-Orleans/239759209943>>

LOUISIANA LANDMARKS SOCIETY'S COMMENTS ON PROPOSED MASTER PLAN AMENDMENTS

Submitted January 9, 2017

Louisiana Landmarks Society appreciates all the work put into the Master Plan Amendments by officials, neighborhood groups, organizations and individuals. There has been a tremendous amount of material submitted and yet the process seems to have been cut short. We question if the process and comment period are adequate. With that said, we submit the following limited comments:

Chapter 6:

The proposed pdf of Chapter 6 is improperly posted and not fully readable. This does not allow for adequate comments.

1. The new local historic districts, now approved by the City Council, should be added to the list of local historic districts.
2. Louisiana Landmarks Society requests the word "sustainable" be retained throughout the chapter.
3. Deconstruction and salvage should *NOT* be removed from the preservation chapter. We suggest encouraging deconstruction and salvage prior to the demolition of any historic building.
4. Enhancing guidelines for New Construction should always include that designs, whether contemporary or not, be in scale and character with the existing historic neighborhood. Any new design, rehabilitation or renovation should complement and be in context with the "tout ensemble" of the neighborhood.
5. Louisiana Landmarks Society should be identified and consulted as an additional community resource in matters concerning historic and neighborhood preservation.
6. Although Equity and Resilience are admirable goals, their inclusion in Chapter 6 is technically not the correct placement.

Chapter 14.

1. Louisiana Landmarks Society is opposed to empowering one person, namely the Executive Director of the CPC, to have authority to make final decision on minor map amendments and final decisions on interpretation of the FLUM.
2. Louisiana Landmarks Society strongly objects to the proposal to remove density limitations on all residential land use categories.

Paul Cramer

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

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

January 8, 2017

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

RE: Master Plan Amendments

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Thank you for all that you do.

Sincerely,

Patrick Armstrong

117 S. Solomon #1

New Orleans, 70119

3. Objection is made to proposals seeking to allow small multi-family residential as being too broad and inconsistent with existing language to discourage multi-family residential that is out of scale with neighborhoods.
4. Louisiana Landmarks Society discourages the proposal to merge MUL and MUM zoning categories. (4-17 Section C)
5. Objection is made to the proposals that would grow commercial uses, or provide for ill-defined “culture-serving” uses, at the expense of conducive and established neighborhood uses. The interpretation has the potential to be too broad.
6. Louisiana Landmarks Society requests the retention of “tout ensemble” in Chapter 14, and encourages the term to be used more often to define and retain the individual and unique character of each neighborhood in New Orleans.
7. The Land Use chapter is an inappropriate placement for definitions of Equity and Resilience. Vision seems the more logical place.
8. We fully support the proposal to “preserve and expand parks and green space, and protect passive open green space in parks from conversion to intensive and commercial uses.”

Community Participation Plan (CPP)

Louisiana Landmarks Society supports the implementation of the CPP including adequately staffing the CPP with professional, independent staff to engage and inform community members, ensure full and accurate information is provided by applicants on their projects, provide information on zoning, facilitate meetings and produce objective reports on Neighborhood Participation Program (NPP) meetings.

General Statement:

The mission of Louisiana Landmarks Society is to support historic and neighborhood preservation, and all matters of zoning and planning that have the effect of contributing to and sustaining the *tout ensemble* and the historic character of each neighborhood in the City of New Orleans. Louisiana Landmark Society is a firm believer in and consistently supportive of a broad and inclusive public and neighborhood participation in all civic processes, especially those that directly affect and influence the well-being and quality of life of the residents in the neighborhoods.

Comments on Other's Submissions:

- **HousingNOLA & GNOHA**

While we see natural alignment between housing affordability and historic preservation in a city where overzealous blight remediation and under-regulated short term rentals have reduced residential units in traditional neighborhood, we have significant concerns about the criteria for and abuse of any exemption to HDLC or VCC guidelines on the basis of affordable units. *In particular, promises of new affordable units should never be the basis for demolition of an historic structure that would otherwise be disallowed.* Numerous examples within the city show the potential for the adaptive use of historic structures to provide affordable units. If this addition is included, we request that preservation and neighborhood groups be specified in the "Who" field to indicate an inclusive stakeholder process.

- **MCCNO**

6A. We support the proposed citywide survey to identify arts and cultural venues of historic significance. A thorough review of existing surveys of National Register Districts could serve as the basis for such an inventory.

6B. Attaching a conditional use such as live music performance to a property in perpetuity is not appropriate within residential neighborhoods. Doing so fails to acknowledge the disparate impacts on quality of life—including noise, foot and vehicular traffic, refuse collection, etc.—associated with different venues. At a bare minimum, any non-conforming use attached the parcel rather than owner should be accompanied by provisos to safeguard neighborhood quality of life and community members should be invited to provide input on the decision.

6C. Proposed soundproofing grants should come with the additional provision that any recipients be required to demonstrate that the materials being used are appropriate and compatible with historic building fabric and that historic exterior elements, such as windows, not be impacted.

- **Mayor's Office**

3.A The proposed changes related to a pattern book of "Resilience Strategies for Historic Commercial Corridors" are consistent in theme with the proposed amendment from Greater New Orleans Water Collaborative to "to establish guidelines for appropriate resilience retrofits in historic settings [which] address energy efficiency, on-site water management, elevation and related issues." We endorse these proposals to establish resilience best practices for historic places but emphasize the need for substantial involvement by neighborhood associations and preservation professionals in their development. Similarly, it should be clear that a pattern book requires written explanation of guiding principles to be of maximum value.

3.2 Revise but do not remove language regarding the value of salvage and reuse of historic building materials. This is compatible with both goals 3 and 4. The embedded energy, craftsmanship, and inherent quality of materials—particularly old growth lumber and imported quarried stone when present—found in historic structures within New Orleans is grounds for salvage and reuse. Furthermore, the reuse of building materials, like the reuse of buildings, is inherently place-based economic development. Rather than using NCDC as a vehicle to promote

salvage and reuse, the city could simply pledge to support private sector and nonprofit endeavors in this area.

5. Include VCC alongside HDLC as an agency with preservation duties and public outreach responsibilities.

Louisiana Landmarks Society opposes the proposals to “eliminate all residential unity densities in the Future Land Use Categories” as well as other proposals to increase densities due to the impacts on the scale and character of neighborhoods – particularly those in our historic core.

- **Greater New Orleans Water Collaborative**

See comments under Mayor’s Office above.

- **Holy Cross Neighborhood Association**

The proposed registry of contributing structures “not under city jurisdiction, such as state bridges, federal locks, waterways, docks,” etc. would contribute positively to our understanding of New Orleans development over time. It would be made more robust with the inclusion of historically significant public works managed by City Park and the Sewerage and Water Board. While listed structures may not be subject to local oversight by the HDLC or VCC, local recognition of their significance could help inform future Section 106 proceedings as well as Historic American Engineering Record documentation projects.

NEIGHBORS FIRST FOR BYWATER



Neighbors First for Bywater, LLC

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Robert D. Rivers, Executive Director
1300 Perdido St., 7th Floor
One Stop Shop
New Orleans, LA 70112

Date: January 9, 2017

Re: Master Plan Amendments

Dear Mr. Rivers:

The Board of Neighbors First for Bywater (NFB) has discussed the Master Plan amendment process with our membership and concluded to take the following positions (and as described below):

1. We support all of the amendments proposed by the Louisiana Landmarks Society
2. The Master Plan should retain density limits as required by the City Charter
3. The Master Plan should not be amended outside the formal process and interpretation of the Master Plan should be a legal matter as stipulated by the “force of law” provision of the City Charter.
4. The term “tout ensemble” should remain in the description for the Mixed-Use Historic Core future land use category
5. We oppose Councilmember Ramsey’s amendment to include “culture-serving businesses and facilities” in in the description of the Residential Historic Core future land use category

Louisiana Landmarks Society Amendments

We support all of the amendments proposed by the Louisiana Landmarks Society. These amendments were developed by Louisiana’s leading preservation organization with input from

neighborhood organizations from New Orleans' historic neighborhoods and reviewed and revised by the city's most experienced preservation lawyers. These amendments will protect and preserve the integrity of our historic neighborhoods and the cultures that sustain them. Adoption of these amendments will set a national standard for preservation planning.

Density Limits

We are opposed to removing the density limitations from any future land use category's Development Character section in Chapter 14 (Section C) and believe that all residential future land use category descriptions must include density limits. Density limitations are required by the City Charter (Section 5-402.1) which states, "*The Land Use element shall consist of text setting forth land use issues and policies, and a Future Land Use Map setting forth categories of allowable uses and density, for the City.*" The density limitations provide an overall goal for the development character of neighborhoods and thus are essential to the Master Plan.

Force of Law

We are opposed to the CPC amendment to provide the Executive Director the authority to make final decisions on map amendments and final decisions on interpretations of the Future Land Use Map. This would violate the City Charter, Section 5-404.4, which specifies the mandatory review process and schedule as well as public input process in amending the Master Plan. These limitations on amendments to the Master Plan are a safeguard to protect its integrity.

Tout Ensemble

We are opposed to removing the term "tout ensemble" from the description of the Mixed-Use Historic Core future land use category in Chapter 14, Section C. New mixed-use developments can be very large and overwhelm adjacent historic neighborhoods with foreign and oppositional architecture. It is imperative that new mixed-use developments respect the historic character of the surrounding neighborhoods.

Culture-serving Businesses and Facilities

We are opposed to Councilmember Ramsey's text change to the description of the Residential Historic Core future land use category (Chapter 14, Section C) to include "culture-serving businesses and facilities". The proposed amendment does not provide any specific language or justification for the text change nor is clear why this change should be specific to Residential Historic Core neighborhoods. There is no definition for "culture-serving businesses and facilities" in the Master Plan glossary (Volume 2) so there is no way to interpret such text. Future land use descriptions for residential categories describe residential areas, so it is not clear why commercial uses ("businesses") are being inserted here.

Thank you for your consideration of these points in completing the City Planning staff report on the amendments. We look forward to participating in the amendment process and providing more specific input on matters that affect the Historic Core neighborhoods.

Sincerely,
Julie Jones, President
Brian Lockett, Treasurer

Paul Cramer

From: Robert D. Rivers
Sent: Sunday, January 08, 2017 10:19 AM
To: Paul Cramer
Subject: FW: Proposed changes to the Master Plan

From: knittingduck@aol.com [mailto:knittingduck@aol.com]
Sent: Saturday, January 07, 2017 1:22 PM
To: Robert D. Rivers
Subject: Proposed changes to the Master Plan

Dear Mr Rivers:

I am a lifelong resident of New Orleans and have lived in Bywater for 42 years. I would like to share my thoughts on some issues regarding the work that you and your staff are doing regarding the Master Plan.

Before anything is done about Councilperson Ramsey's "cultural services" they must be defined. I fear that this extremely vague term could lead to rampant misuse of property in Bywater and throughout the city. Her voting record supports my fears.

I support the amendments made by the Louisiana Landmarks Society.

Density limits should remain as they are currently.

Historic Core areas should be encouraged to maintain the *toute ensemble* for future development.

Thank you,

Anthony J. Eschmann
822 Lesseps St.

Mark M. Gonzalez

Attorney at Law

830 Union Street, Suite 302
New Orleans, Louisiana 70112

(504) 524-1668 - FAX: (504) 524-1066
e-mail: mark@markgonzaleznola.com

January 6, 2017

VIA TELECOPIER AND E-MAIL: (504) 658-7032

Robert D. Rivers, Executive Director
CITY PLANNING COMMISSION
1300 Perdido Street, 7th Floor
New Orleans, Louisiana 70112

RE: Master Plan Amendments

Dear Mr. Rivers and City Planning Commission:

Please accept the following as input from a 30+ year resident of New Orleans very concerned about and involved in its well-being:

1. The Master Plan should retain density limits as required by the City Charter;
2. The Master Plan should continue to have the force of law as specified in the City Charter;
3. The term "tout ensemble" isn't a nice sounding meaningless phrase - it helps describe and determine land use designation and should remain in land use designations for Historic Core areas;
4. I support, and you should as well, the very well studied and laid out amendments sent to you by the Louisiana Landmarks Society;
5. You should NOT support Nadine Ramsey's vague and troublesome proposal for "cultural services" in Historic Core areas until it is well defined what in God's name she is talking about - and if they are good for a Historic Core - they should be good city-wide.

Sincerely,



Mark M. Gonzalez
3106 Dauphine Street