



A NEED FOR CLARITY

THE REVISED NEW ORLEANS 2030 DRAFT PLAN

A Report from the
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INTRODUCTION

The process to create a master plan with the force of law for New Orleans has reached a pivotal moment. The City Planning Commission has unanimously approved and presented to the City Council for review a draft of *Plan for the 21st Century: New Orleans 2030* (draft plan). The City Council has until May 26 to act on the plan.

A master plan should be a broad policy document that provides general direction over the long-term. It should set forth a vision for the future and establish a clear hierarchy of goals, policies and actions for achieving that vision. The goals, policies and actions should be internally consistent and logical. Together, they should provide a coordinated set of deliberate actions for transforming a city from the way it is to the way it wants to be, while taking into account uncertainties about the future.¹

Unfortunately, the draft plan still falls short of the requirements for a good master plan. While the plan provides basic guidance on land use, it fails to provide concrete guidance in important areas, such as urban design. In key areas, such as housing and historic preservation, the draft plan cedes planning to a new group or future plan – rather than actually presenting a plan. The organization of goals, strategies and actions remains unclear and inconsistent, making the plan difficult to use. The focus is heavily short-term. Finally, the draft plan fails to effectively address serious challenges facing the city or provide thoughtful priorities for achieving the vision it sets out in its opening chapter.

Getting the plan right is vital. Once the City Council adopts the plan, all land use laws and decisions, as well as the city's plans for capital improvements, must be consistent with it.

The City Council should return the draft plan to the City Planning Commission with instructions to immediately begin the process of remedying its shortcomings. Some of these problems can be addressed in the limited time the City Charter allots for revisions at this

stage. Correcting other deficiencies will take more time than the current master planning cycle allows. These problems will have to be addressed through major amendments in the next annual review.

We urge the City Council to provide the City Planning Commission now with the resources it needs to complete the task properly. New Orleans needs a clear, focused, coherent and credible guide for all aspects of the city's physical development. The draft plan does not provide that.

At this point, the alternative to phased improvement of the plan is outright rejection of it. This would put planning in limbo for the indefinite future and delay work on a critical element of the rebuilding process – the crafting of a new comprehensive zoning ordinance (CZO).²

Despite the draft plan's numerous flaws, it includes a land use map sufficient to allow work on the CZO to proceed. We stress, however, that the document before us does not provide sufficient long-term guidance for the future development of the city. It will require major revision to get there.

THE PROCESS

The City Council has the option of adopting, modifying or rejecting the draft plan. If the Council rejects it or proposes any modifications, the plan will return to the City Planning Commission for public hearing and comment. The City Planning Commission has 60 days to provide a recommendation to the City Council on its rejection or modification. The City Council then has 45 days to take final action on the plan. If, at any point, the City Council fails to take timely action on the master plan, it will be deemed adopted by the City Council.

Once the City Council adopts a master plan, the City Planning Commission will move forward to complete a new comprehensive zoning ordinance, including a map that reflects the policies in the land use element of the master plan.

BGR'S REVIEW

BGR has followed the master planning process closely during the past year and a half. In October 2009, BGR released two reports commenting on the second public draft of the master plan (the September draft): *In Search of the Master Plan: Making the New Orleans 2030 Draft Plan Work* and *Connecting Neighborhoods to City Hall: Neighborhood Participation and the New Orleans 2030 Draft Plan*. Both reports are available at www.bgr.org.

BGR's reports cited four fundamental shortcomings with the September draft:

- The draft did not provide an effective guide for shaping the future physical development of the city.
- It was unwieldy and difficult to use. The reader struggled to follow the thread from goals to policy directives.
- It set unrealistic goals while avoiding the difficult task of setting priorities. It did not grapple adequately with many of the fundamental challenges the city faces.
- The proposed community participation program was complicated and, if enacted into ordinance, would fail to meet the requirements imposed by the City Charter.

The draft plan currently under review by the City Council has been reorganized, making it somewhat easier to use. However, with the exception of the community participation chapter, it is not substantively different than the September draft. As a result, most of the shortcomings BGR identified in its earlier reports remain.

MAKING THE DRAFT PLAN AN EFFECTIVE GUIDE FOR DEVELOPMENT

Master plans are intended to manage and guide physical development over a 10- to 25-year period. They are citywide in scope and comprehensively cover topics

with a common link to the physical environment. New Orleans' charter requires a 20-year plan for the physical development of the city.

Like the September draft, the current draft plan fails to provide significant guidance on issues of great importance to the future physical development of New Orleans. In key areas, the draft plan cedes planning to a new group or future plan – rather than actually presenting a plan. It glosses over, and in some cases overlooks, critical issues related to land use, urban design, neighborhoods and economic development. In addition, topics unrelated to the physical development of the city are presented with an overabundance of detail.

Missing Plans for Key Elements

The current draft plan, like the September draft, is particularly lacking in the areas of housing and historic preservation. Instead of providing concrete policy guidance in these areas, the plan calls for the creation of task forces to craft additional plans. Punting plan-making to future groups makes light of the charter requirement for a master plan that includes housing and historic preservation elements. It also removes policymaking from the public arena of the master planning process and hands it off to a select group of people. In addition, the current draft plan often overemphasizes the convening of groups at the cost of presenting policy guidance. Among the current draft plan's strategies and actions are recommendations for approximately 20 new groups and a similar number of new plans or studies.

Weaknesses in Land Use

The centerpiece of any master plan is land use, and here more guidance is needed. While the draft plan describes land use categories and presents a map showing where they will apply, it does not clearly indicate which areas of the city are expected to change and which are expected to stay the same under the new land use categories. This could be accomplished through a map.

Urban design – which defines how visual and physical qualities of the urban landscape can capture a city's identity and values – still receives only cursory treat-

ment in the land use chapter. To the extent that urban design principles are included, they are so general that they could be applied anywhere in the city – or to any other city. This is unfortunate, given the importance of urban design in a city renowned for its architectural heritage and unique urban form. The draft plan indicates that the comprehensive zoning ordinance will address urban design in more detail. More robust urban design principles should nonetheless be included in the master plan.

Land use categories remain unnecessarily complex. There are still 24 categories, based on no fewer than three variables – age (pre-war, post-war), density (low, medium, high) and unit type (single-family, multi-family) – for residential categories. It is unclear how the new zoning code will translate such a large number of land use categories into zoning categories.

Inappropriate Topics

While the draft plan is short on guidance for physical development, it addresses a wide range of topics that are not relevant to the physical development of the city. For example, it makes recommendations for improving police-community relations and hiring practices for firefighters. While important, such topics are not appropriate for a master plan. As is, they muddle the plan and make it difficult for the reader to drill down to the issues and recommendations related to the physical development of the city.

Recommendations to Make the Plan an Effective Guide

To fulfill its purpose and serve as a guide to the future physical development of the city, the master plan should:

- Provide concrete policy guidance on the physical growth and development of the city for the elements mandated by the city charter. This includes creating housing and historic preservation plans.
- To complement the land use map, provide a map showing which areas of the city are planned for growth and change, and which areas will be conserved as they are.

- Provide a comprehensive treatment of urban design issues.
- Limit the plan's focus to matters involving the physical growth and development of the city.

MAKING THE PLAN USABLE

In order for policymakers to implement the master plan, it must be arranged in an understandable manner. It must allow policymakers to follow the thread of content from goals for the future to specific actions for achieving them. The goals, policies and actions must be internally consistent and logical. Together, they should provide a coordinated set of deliberate actions for transforming a city from the way it is to the way it wants to be.

The September draft failed to meet this standard. It was difficult to use due to an unnecessarily complicated structure and an overabundance of background information. The draft used terms such as goals, policies and actions inconsistently, and to some extent interchangeably. In addition, the statements of goals, policies and actions sometimes varied. It was difficult to follow the logical progression from goals to policies to actions.

In the current draft, the planners made significant organizational changes to make the draft plan more readable. However, they did not address problems relating to consistency and logic.

Organizational Issues

To make the draft plan more user-friendly, the planners added more internal cross-references and moved most background information from Volume 2 to Volume 3. The additional cross-references are a definite improvement, allowing the reader to more easily navigate within the plan's chapters. The draft plan would benefit from still more cross-references, particularly between chapters and volumes.

The September draft included an overabundance of information on present conditions. In most of the policy-oriented chapters, more than half of the content was

GOALS, POLICIES, ACTIONS

Most master plans include goals, policies and actions relating to city planning issues:

Goals describe ideal future conditions for a particular topic and tend to be broad and aspirational.

Policies provide more focused guidance on the issues associated with each goal. They are designed to assist staff, commissions and councils, and the public in evaluating proposals, allocating resources and making decisions so that the goal is ultimately achieved. The draft plan generally refers to “strategies,” rather than policies.

Actions are the specific steps a community will take to carry out its policies. They might include new ordinances, capital improvements, and other tasks that can be assigned to city departments and prioritized when the plan is adopted.

devoted to documenting present conditions. This made the plan unwieldy and focused the reader too much on the past and present. The planners attempted to address the problem in the draft plan by moving the supporting information from Volume 2 to Volume 3. This made the draft more manageable. However, the wholesale shifting of information has in some cases stripped away the context needed to understand the goals and strategies. A more judicious editing could correct this problem.

Inconsistencies

The draft plan’s goals, policies and actions should be stepping stones from the present to future fulfillment of the plan’s vision. It uses the term “strategies,” in general, instead of the word “policies.” Regardless of terminology, the plan must clearly articulate its proposals, present them in a logical hierarchy and apply them consistently.

The draft plan’s policy-oriented chapters are difficult to understand and full of troubling inconsistencies. Each chapter opens with a chart of goals and policies for decision makers, which is followed by a fact sheet, findings and challenges. The chapter is then very briefly introduced before a different, yet similar, matrix of goals, strategies and actions is presented.

This is followed by a narrative version of the goal-strategy-action matrix that, again, differs somewhat from the preceding accountings of the goals. By the end of the chapter the reader is left confused by the differences among the seemingly repetitive sections and without any sense of why the dozens of actions described have been chosen as recommendations.

In addition, some of the strategies and actions in the draft plan do not logically follow from the goal they are meant to support. This leaves decision makers without accurate or full directions on how to achieve the goals set out in the plan.

Recommendations to Make the Plan More Useable

To serve as a clear and useable policy guide, the master plan should:

- Organize each element in a consistent, streamlined manner. This includes creating a clear hierarchy of goals, strategies and actions and adhering rigidly and consistently to the meaning of the words “goal,” “strategy” and “action.”
- Number goals, strategies and actions so they can be easily cross-referenced within and across chapters.
- To make the master plan easier to use, create an index for the document so that a reader can see where an issue is addressed in each chapter and volume.
- To provide context, where necessary, to the recommendations presented in the plan, add back *relevant* information to the chapters. Rearrange chapters so that they open with an introduction and then present the related goals, strategies and actions.

CREATING A REALISTIC AGENDA

In order to serve as a credible public policy resource, the master plan must provide guidance within a realistic financial context and with realistic expectations for

what the city has the capacity to accomplish. It must deal frankly with existing challenges and explore the relationships between the various elements of the plan. It must prioritize the most critical problems for fuller policy treatment and corresponding actions.

Like the September draft, the current draft plan ignores economic realities, fails to follow through on the implications of key premises and sets unrealistic timetables. It continues to treat overarching areas of concern – such as the city’s vulnerability to natural hazards and the need for blight remediation – in silos, without drawing its recommendations together into a coherent whole. Unlike the September draft, the current draft plan does establish priorities for the plan as a whole. Unfortunately, these priorities are somewhat confusing, and appear to be mainly early action items rather than long-term priorities.

Making the Plan Credible

A master plan requires an honest assessment of the factors holding the city back and concrete ways that it can best shape its physical presence to address them. The draft plan falls short in this regard. For example, nowhere does it list the key factors limiting the city’s economic prospects – the necessary starting point for any rational economic strategy.

The draft plan fails to explore the implications of some of its premises. For example, it asserts that there could be an oversupply of single-family homes by 2013.³ It also says that a significant portion of new housing demand in New Orleans will likely be for newly constructed, denser, multi-family housing. Taken together, these assertions suggest that there is a major problem ahead for some of New Orleans’ single-family neighborhoods. But the draft plan neither acknowledges nor develops a strategy for dealing with that problem.

The timetables for accomplishing goals, strategies and actions are largely unchanged from the September draft. As a result, the vast majority of actions the plan recommends are short-term actions to be taken in the next five years. It is unrealistic to think that New Orleans can fund and implement the plan’s more than 350 actions during the next five years. The short-term focus of the plan is also at odds with its mission as a

20-year plan for the physical development of the city. The draft plan does not tie its many chapters and recommendations into a coherent whole. Each policy chapter exists in a silo. Not only does this create repetition in the plan; it downplays the interconnectedness of issues facing the city. The most severe challenges – the city’s vulnerability to natural hazard and massive blight – should be treated as overarching areas of concern that guide the plan.

Missing and Mixed-Up Priorities

The September draft did not set any priorities. The Executive Summary of the current draft plan identifies 10 top priorities for the future:⁴

- Creation of a land use plan.
- Establishment of a city department to promote environmental resilience.
- Acknowledgement that New Orleans faces an unprecedented crisis of blight, with specific actions such as the implementation of innovative approaches for tackling blight multiple blocks at a time.
- Creative thinking about new structures to stimulate economic development, with specific actions such as the creation of a public-private partnership for economic development.
- Crafting an integrated transportation strategy.
- Launching a program of district planners.
- Reinvention of the city’s approach to affordable housing, through the creation of a task force to create a housing plan.
- Establishment of a formal community participation program.
- Conservation and reinforcement of the character of New Orleans’ historic and traditional neighborhoods.
- Take advantage of untapped market potential by developing underutilized “opportunity” sites and corridors as 21st-century neighborhoods.

The list appears to be an afterthought, rather than a well-conceived set of priorities driving the planning. It is hard to connect the chosen priorities to the body of the plan. In addition, it is more in the nature of a short-term governmental to-do list, rather than a set of overarching priorities for the future development of the city. The first priority – creation of a land use plan – is baffling, given that the current plan contains a chapter purporting to be the land use plan.

Recommendations to Create a Realistic Agenda

To ensure its credibility and long-term relevance, the master plan should:

- Employ realistic assumptions about future prospects.
- Establish a realistic timeframe for the recommended actions.
- Create a sensible set of priorities for each element and for the plan as a whole.
- Weave overarching areas of concern such as natural hazards, blight remediation and land use throughout the text, using them to inform priorities.

AN IMPROVED PARTICIPATION PROGRAM

The draft plan’s community participation chapter is significantly different – and much improved – from the September draft. The earlier draft laid out a highly detailed proposal for a system of district councils, district planners and standing advisory committees. The district councils were to serve as the locus of public discussion and comment on land use and other proposals for the city’s planning districts. The Standing Advisory Committees were to address issues of importance across multiple districts.

The September draft marginalized, rather than empowered, neighborhoods by inserting an extra layer of bureaucracy between them and the City Planning Commission. And it would have required a significant

commitment of financial and human resources to implement and operate.

The draft plan eliminates many of these shortcomings by setting out a broad outline for community participation. While it still proposes the creation of district councils and the use of district planners, it does not define their numbers, boundaries or the details of the councils’ operations. It clarifies that the City Planning Commission should work directly with neighborhood organizations on issues of neighborhood importance – rather than filtering them through a district council. This would leave district councils to handle only issues of truly district-wide significance.

Yet, while the community participation chapter in the draft plan is an improvement over the previous proposal, it still fails to provide for the *meaningful* neighborhood review of land use decisions and other issues that affect quality of life as mandated in the City Charter.⁵ While it would establish a system for informing neighborhoods about land use issues and taking their comments on them, it would not require government to provide a timely response to neighborhood comments and concerns. This should be added.

Recommendation to Further Improve the Participation Model

To ensure the neighborhood participation proposal in the master plan fulfills what the City Charter envisions, the City Planning Commission should not only inform neighborhoods of planning and land use matters in a timely manner and collect comments, it must also acknowledge and respond in some manner to those comments.

CONCLUSION

With the exception of the community participation chapter and organizational changes, the draft plan approved by the City Planning Commission and currently under review by the City Council is not substantially different from the September draft. As a result, many of the shortcomings BGR identified in its earlier reports remain.

Specifically, the draft plan does not provide sufficient guidance on the physical development of the city. It strays from its mission by covering an array of issues unrelated to physical growth and development. The organization of its goals, strategies and actions is unclear and inconsistent, making the plan difficult to use. And the draft fails to effectively address serious challenges facing the city or set forth priorities for achieving the vision it lays out in the beginning.

New Orleans needs a clear, focused, coherent and credible guide for the city's physical development over the next 20 years. The City Council should instruct the City Planning Commission to make the changes needed to get there.

At this point in the master planning process, the City Charter imposes time constraints on the process. Nevertheless, the planning staff can accomplish a number of changes within a matter of weeks. Matters that can be addressed in that time include:

- Creating a map – to complement the land use map – showing which areas of the city are planned for growth and change, and which areas will be conserved as they are.
- Deleting topics unrelated to the physical growth and development of the city.
- Organizing each element in a consistent, streamlined manner, creating a clear hierarchy of goals, strategies and actions, and adhering rigidly and consistently to the meaning of the words “goal,” “strategy” and “action”.
- Numbering goals, strategies and actions so they can be easily cross-referenced within and across chapters.
- Creating an index for the document so that a reader can see where an issue is addressed in each chapter and volume.
- Providing context to the recommendations presented in the plan by adding back *relevant* information, where needed, to the chapters. This

includes rearranging chapters so that they open with an introduction and then present the related goals, strategies and actions.

- Creating a sensible set of priorities for each element and for the plan as a whole.

To address fundamental, conceptual issues, the City Council should provide the City Planning Commission with clear instructions and the necessary funding – including funding for experts – to prepare changes for adoption by amendment of the master plan at the first annual review allowed by the City Charter. These changes include:

- Providing concrete policy guidance on the physical growth and development of the city in the elements mandated by the city charter, including the housing and historic preservation plans.
- Providing a comprehensive treatment of urban design issues.
- Employing realistic assumptions about future prospects.
- Establishing a realistic timeframe for recommended actions.
- Weaving overarching areas of concern such as natural hazards, blight remediation and land use throughout the text, and using them to inform priorities.

The plan can be amended annually, and it is crucial that the city bring in the outside expertise necessary to fix the broad deficiencies in the draft plan.

END NOTES

¹ Miller, Barry, “Plans that Fit the Purpose,” in Hack, Gary, Eugenie L. Birch, Paul H. Sedway and Mitchell J. Silver, eds., *Local Planning: Contemporary Principles and Practice* (ICMA Press, 2009), p. 218.

² The City Charter requires that the CZO be consistent with the master plan. Sec. 5-406(1).

³ *Plan for the 21st Century, Volume 3*, City of New Orleans, pp. 5.21-5.22.

⁴ *Plan for the 21st Century, Volume 1, Executive Summary*, City of New Orleans, p. 19.

⁵ City of New Orleans, *Home Rule Charter*, Sec. 5-411, provides: “The City shall establish by ordinance a system for organized and effective neighborhood participation in land use decisions and other issues that affect quality of life. It shall provide for timely notification to a neighborhood of any proposed Land Use Action affecting the neighborhood; it shall also provide the opportunity for meaningful neighborhood review of and comment on such proposals. In addition, it shall provide the opportunity for meaningful neighborhood participation in the formulation of the Master Plan or any amendment thereto.”



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