



MAKING THE NEW ORLEANS 2030 DRAFT PLAN WORK

A Report from the **Bureau of Governmental Research**

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Madeline D. West, *Chair* Pamela M. Bryan Aimee Adatto Freeman Andrew B. Wisdom

J. Kelly Duncan Sterling Scott Willis

BGR Project Staff

Janet R. Howard, *President & CEO* Peter Reichard, *Projects Manager* Ryan Galvin, *Research Analyst*

Consultants

Sedway Consulting/Barry Miller Consulting

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EXECUTIVE SUMMARY

On September 15, 2009, the City Planning Commission released a second draft of *Plan for the 21st Century: New Orleans 2030*. The draft is the most recent product of a year-long master planning and public participation process. If the plan is adopted by the City Planning Commission and the City Council, all land use laws and decisions, as well as the city's plans for capital improvements, will have to be consistent with it.

A master plan should be a broad policy document designed to provide general direction about a city's physical development over the long term. It should set forth a vision for the future and establish a clear path for transforming a city from the way it currently is to the way it wants to be, while taking into account uncertainties about the future. It should provide clear, easily accessible guidance for the people who will ultimately use it. And it should work within the legal framework set forth by city and state laws.

Drafting a long-term master plan for a city that is still recovering from a major disaster is no small feat. The draft plan represents a massive effort on the part of the City Planning Commission, its contractors and the public. Despite the unusually limited time period for its drafting, the process drew on a remarkable level of public participation, and the draft plan presents an ambitious vision for New Orleans in 2030.

For the master plan to fulfill its promise as a guide for the long-term physical growth and development of the city, it needs clear, achievable goals that are supported by strategic policies and prioritized, concrete action points. As released on September 15, 2009, the draft plan does not fulfill its promise.

The Draft Plan's Shortcomings

The draft plan suffers from major areas of weakness, including the following:

■ The draft plan does not provide an effective guide for shaping the future physical presence of the City of New Orleans.

- The draft plan is not user-friendly and, to some extent, not useable.
- The draft plan sets unrealistic goals while avoiding the difficult task of setting priorities. It does not grapple adequately with many of the fundamental challenges the city faces.
- As of the day of the first public hearing, the draft plan lacked key chapters necessary for public appraisal of the document.

A Lack of Focus on Physical Development

The city charter requires the Planning Commission to prepare a 20-year master plan for the *physical* development of the city. In order to serve as an effective guide for physical development, the plan must provide clear policy directives to those who will make the relevant policy decisions.

Unfortunately, the draft plan fails to provide the necessary guidance on issues of great importance to the future physical development of New Orleans. In some areas, such as housing and historic preservation, it punts the policy formulation to a new group or a future plan. The draft plan calls for approximately 20 new groups and 20 new plans or studies. It glosses over other topics critical to the physical development of the city, such as land use and urban design.

While the plan is weak in guiding physical development, it addresses a wide range of unrelated issues. These include a ban or a tax on plastic shopping bags and a call for universal health insurance. The net effect of the policy tangents is a dilution of the plan's mission.

Hard to Use

In order for policymakers to implement the master plan, it must be arranged in an understandable manner. It must use clear and consistent terms. Most importantly, it must allow policymakers to follow the thread of content from goals for the future to specific actions for achieving them. The plan's goals, policies and actions must be clearly articulated, presented in a logical hier-

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archy, and applied consistently throughout the plan.

The draft plan is often confusing and inconsistent. Many of the policies and actions in it do not follow logically from the goal they are meant to support. In addition, the line between goals, policies and actions is often murky, with actions mislabeled as policies and vice versa. This makes it very difficult to determine whether an item in the plan is intended to have the force of law.

The plan provides an overabundance of background information. For example, 40 of 74 pages in the chapter on neighborhoods and housing discuss past and existing conditions. This makes the plan unwieldy and shifts the reader's focus to the present and past, rather than the future.

A Credibility Problem

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 recognize and deal with the challenges facing the community and establish priorities for addressing them.

Unfortunately, the plan does not deal frankly with certain challenges facing the city, and it fails to set realistic goals. For instance, in its list of challenges for economic development, it fails to mention perhaps the greatest impediment to attracting new investment in New Orleans: the perception that the city is not a safe place to put dollars due to catastrophic flood risk.

The chapters in the draft plan are not tied together into a coherent whole. Critical challenges, such as blight and natural hazards, are addressed in silos, rather than treated as overarching areas of concern that guide the entire plan. Furthermore, the plan does not set priorities that reflect the city's principal needs. While the draft plan identifies critical infrastructure needs totaling billions of dollars, it accords these fundamental needs no greater priority than any other.

If the master plan offers up an impractical wish list of capital improvement projects, without distinguishing immediate needs from daydreams, budget planners will look in vain for guidance. In addition, the varied and numerous proposals in the draft plan will set up the city for open season on funding demands.

Missing Pieces

As of the day of the first public hearing on the draft plan, the document lacked chapters on citizen participation and implementation, as well as its appendix. The lack of an implementation chapter makes it all the more difficult for citizens to determine the intent of the plan. The lack of an appendix makes it impossible to check the plan's assumptions against background data. And the lack of a citizen participation piece, when citizens are supposed to be considering the plan and making comments, is both ironic and troubling.

Based on brief references to citizen participation in the draft plan, BGR is concerned that the planners intend to propose a complicated and top-heavy citizen participation process based on planning districts, rather than a system that involves neighborhoods directly in land use decisions and quality of life issues.

Making the Draft Plan Work: **Conclusion and Recommendations**

The Planning Commission and its contractors embarked on an ambitious time schedule for completing the master plan. They have made much progress toward that end. But at this point, it is more important to get it right than to get it done quickly.

BGR therefore recommends that the Planning Commission not adopt the draft plan in its current form. Instead, the Planning Commission should take the additional steps necessary to produce a clear, focused, coherent and credible guide for the city's physical development over the next 20 years. With aggressive editing, bold rewriting and fortitude on the policy front, the Planning Commission can get the master plan on track.

The Planning Commission has a few options for addressing the plan's shortcomings. It could send the plan back to the current planning team with instructions to make the major revisions required to address the plan's shortcomings. Alternatively, it could retain

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an editorial team with planning expertise to work with the current planning team. The editorial team would undertake the major revisions required to convert the draft into a comprehensible document, while the current contractors continue the work needed to fill in the critical gaps.

BGR strongly recommends that the city hire an editorial team of highly qualified planning experts. We realize that this would cost the cash-strapped city money. But having a new set of eyes undertake the necessary revisions is the best way to ensure that the city soon gets the guide it needs for the next 20 years.

BGR offers the following recommendations for revising the draft plan:

Providing Effective Guidance. 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 for the elements mandated by the city charter.
- Fulfill the city charter's mandate to create housing and historic preservation plans that include policy guidance related to the physical growth and development of the city.
- 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.
- Clarify the definitions of the land use map categories.
- 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 Useable. To serve as a clear and useable policy guide, the master plan should:

■ Organize each element in a consistent, streamlined manner.

- Create a clear hierarchy of goals, policies and actions, with cross-references to the text. Adhere rigidly and consistently to the meaning of the words "goal," "policy" and "action."
- Consistently number goals, policies and actions so they can be easily cross-referenced within and across chapters.
- Significantly trim the background discussions.

Making the Plan a Credible Guide. 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.
- Set priorities for each element, highlighting which actions are urgently needed, as opposed to desirable.
- Weave overarching areas of concern such as natural hazards, blight remediation and land use throughout the text, using them to inform priorities.
- Provide a short list of the top priorities for the city.

Making Sure the Missing Pieces Fit. To advance the neighborhood participation system envisioned in the city charter, the citizen participation chapter should focus first and foremost on meaningful, neighborhood-level citizen involvement in land use decisions and quality of life issues.

INTRODUCTION

On September 15, 2009, the City Planning Commission released a second draft of *Plan for the 21st Century: New Orleans 2030* (draft plan). The draft plan is the most recent product of a year-long master planning and public participation process led by Boston-based Goody Clancy & Associates Inc. It is supposed to serve as a guide for the physical growth and development of New Orleans over the next 20 years.

In October, the City Planning Commission is holding public hearings on the draft plan. The Planning Commission has scheduled a November vote on whether to adopt the draft plan and send it to the City Council for consideration. The City Council is then required to adopt, modify or reject it by ordinance. If the plan is adopted by the City Council, all land use laws and decisions, as well as the city's plans for capital improvements, must be consistent with it.

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

BGR has followed the master planning process closely during the past year, attending meetings and reviewing

METHODOLOGY

To assist in preparing an impartial evaluation of the draft master plan, BGR hired Paul Sedway and Barry Miller through a competitive selection process. Sedway and Miller are San Francisco-based urban planners and consultants with extensive experience writing master plans. As part of their review, they compared the draft plan to the master plans approved in 12 other cities: Atlanta, Baltimore, Denver, Kansas City, Minneapolis, Oakland, Portland, Raleigh, Sacramento, San Francisco, Seattle and Washington, D.C.

BGR used the analysis and information provided by Sedway and Miller as the basis for this report. It synthesized their analysis with observations and information that BGR collected during the master planning process and in the course of preparing reports, including BGR's past reports on planning and land use decision making in New Orleans.

the previous draft. The Planning Commission's contractors requested that BGR not issue a report on the first draft, but rather wait until the second draft was released. In an effort to be constructive, BGR complied with this request. BGR offered verbal comments on the first draft and waited until the release of the September draft to begin writing its analysis of the plan.

In this report, BGR provides an overview of the legal framework for master planning in New Orleans, a discussion of what master plans in general should accomplish, a brief summary of the draft plan's contents, and a discussion of major concerns with the draft plan. It does not summarize or comment on the plan in detail. Nor does it take policy positions on particular recommendations. Rather, it identifies overarching problems and makes recommendations for addressing them.

2008 CHARTER AMENDMENT

Five months after the City Planning Commission selected a team of contractors to write the master plan, New Orleans voters approved an amendment to the Home Rule Charter of the City of New Orleans setting forth the elements required in the city's master plan and processes for creating and changing it. The amendment also provided that future master plans would have the force of law.

The city charter requires that the Planning Commission prepare a 20-year master plan for the *physical* development of the city. The plan must include a statement of goals, objectives and policies for the physical growth and development of the city. It must use both maps and a narrative to set forth the plan's principles, standards and proposals. The plan must include, but is not limited to, the following elements¹:

- Vision, goals and policy
- Land use
- **■** Transportation
- **■** Housing
- Community facilities and infrastructure
- Historic preservation

The 2008 charter amendment gives future master plans the force of law. This means that land use laws and decisions, and city capital improvements, must be consistent with the plan. Specifically, the city charter now requires:

- The city's comprehensive zoning ordinance, zoning map and any other land use laws must be consistent with the master plan.
- The city's capital improvement plan must be consistent with the master plan.
- All land use decisions must be consistent with the land use element of the master plan.

The city charter calls for the master plan to serve as the template that guides the public and private physical development of the city – no more, no less. It officially links all future, adopted master plans with the land use tools and actions necessary to implement them.

WHAT IS A GOOD MASTER PLAN?

Master plans are intended to manage and guide physical development, typically over a 10- to 25-year time horizon. They are citywide in scope and comprehensive in the topics they cover – although these topics share a common link to the physical environment. Their main focus is land use, but they may also address transportation, housing, natural hazards, community facilities, urban design and other topics.

A master plan should be a broad policy document designed to provide general direction over the long term. In a large city, it should not include small details about individual properties or address operational issues. It should set forth a vision for the future and establish a clear hierarchy of goals, policies and actions for achieving that vision. A master plan's policies, goals and actions should be internally consistent and logical. Together, they provide a coordinated set of deliberate actions for transforming a city from the way it currently is to the way it wants to be, while taking into account uncertainties about the future.²

Master plans typically include narrative text to provide

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.

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.

context and elaborate on policies and proposals. Most master plans also include a future land use map that shows the types of land uses envisioned for a city. In many cases, the map also shows the general location of public improvements such as roads, parks and schools. The land use map serves as the foundation for the local zoning map.

The plan should work within the legal framework set forth by city and state laws. It should identify and address the challenges faced by the city. It should be based on reasonable assumptions and estimates of the financial and staffing resources of the city. It should provide clear, easily accessible guidance for the people who will ultimately use it.

OVERVIEW OF THE DRAFT PLAN

The draft plan is billed as a comprehensive, citywide plan that will guide the city's growth for the next 20 years. It contains three volumes:

■ *The Planning Framework* provides background, commentary on government issues and a condensed version of the goals and strategies in the plan.

- *The Technical Plan* is the meat of the plan and provides information, analysis, discussion and implementation recommendations.
- *The Appendix* is supposed to include background analysis, other materials prepared for the plan and information resources.

So far, only the Planning Framework and most of the Technical Plan have been released. As of this writing, the draft of the Technical Plan is missing its final two chapters, which are still being reviewed by the Planning Commission. The Appendix has not yet been released. Unless otherwise noted, when discussing the draft plan this report is referring to the Technical Plan.

The Technical Plan is divided into five parts and 16 chapters:

- Part One, "Setting the Stage," includes four chapters. These chapters provide the vision statement, the context for the plan, background information, a review of existing conditions, and a description of the master planning and public participation process.
- Part Two, "How We Live," consists of four chapters addressing aspects of daily life. These are: Neighborhoods and Housing; Historic Preservation; Green Infrastructure: Parks, Open Space and Recreation; and Health and Human Services.
- Part Three, "How We Prosper," consists of one chapter, Economic Development: Enhancing Prosperity and Opportunity.
- Part Four, "Sustainable Systems," consists of four chapters focused on systems that support residents and businesses. These are: Community Facilities, Services and Infrastructure; Transportation; Resilience: Living with Water; and Environmental Quality.
- Part Five, "From Plan to Action," consists of three chapters relating to plan implementation. They are the Land Use Plan, the Community Participation Program, and Structures for Implementation and Stewardship of the Plan.

The Technical Plan includes dozens of items identified as goals, numerous policies and objectives, and nearly 500 actions. These are concentrated in Chapters 5 through 13. Each of these chapters has a section called "Strategies for Tomorrow," which provides a list of goals and a mixture of policies and actions. Some of the "actions" include narrative text and "sub-actions," which resemble work programs. Each chapter also contains a summary of goals and policies at the beginning and an implementation matrix at the end.

The entire draft plan can be viewed at www.nolamasterplan.com.

WHERE THE DRAFT PLAN FALLS SHORT

Drafting a long-term master plan for a city that is still recovering from a major disaster is no small feat. The draft plan represents a massive effort on the part of the City Planning Commission, its contractors and the public. The draft planning process drew on a remarkable level of public participation, and the draft plan presents an ambitious vision for New Orleans in 2030. The planners produced the draft plan in an extraordinarily tight timeframe, compressing into a one-year period work that normally requires more time.

Given the time constraints, it is understandable that the plan has shortcomings. However, it is imperative to address these shortcomings with vigor if the plan is to be an effective, useable and credible document. This report will address four major areas of weakness:

- The draft plan does not provide an effective guide for shaping the future physical development of the City of New Orleans.
- The draft plan is unwieldy and difficult to use. The reader struggles to follow the thread from goals to policy directives.
- The draft plan sets unrealistic goals while avoiding the difficult task of setting priorities. It does not grapple adequately with many of the fundamental challenges the city faces.

■ As of the day of the first public hearing, the draft plan lacked key chapters necessary for public appraisal of the document.

MAKING THE DRAFT PLAN AN EFFECTIVE GUIDE FOR DEVELOPMENT

The plan is intended to be a 20-year guide for the *physical* development of the city. This is what the city charter requires and, indeed, this should be the focus of any master plan.

However, the draft plan fails to provide significant guidance on issues of great importance to the future physical development of New Orleans. In some areas, such as housing and historic preservation, the plan cedes the planning to a new group or future plan. Meanwhile, critical issues related to land use, urban design, neighborhoods and economic development are glossed over and, in some cases, overlooked altogether. In many places, the draft plan focuses more on convening groups than on guiding the physical development of the city.

Punting on Policies

In some instances, rather than providing policy guidance, the draft plan punts policy formulation to a future advisory group or to a nonprofit organization.

For example, one of the draft plan's two goals for housing is "Reinvented housing policies to support quality neighborhoods and meet the diverse housing needs of all households." The draft plan cites a lack of accurate data on the subject of housing need, and leaves the data collection problem to a nonprofit organization. Then it turns over the policy formulation to a yet-to-be-created housing policy working group.

This is problematic for several reasons. First, the plan fails to meet the spirit of the charter requirement for a housing element that provides policy guidance. Second, though the plan discusses a debate on housing, it does not resolve it. The public deserves the opportunity to comment as part of the master planning process on a concrete set of policies. Finally, leaving the decision making to a new committee divorces the matter

from the public debate that has occurred during the planning process. It turns the keys over to a committee that may not contain a representative diversity of viewpoints.

Historic preservation, another required element of the master plan, receives similar treatment. Rather than resolving conflicts and providing a plan based on consensus, the historic preservation chapter of the plan calls for the creation of plans in the future. Important questions about the city's historic resources go unanswered, and some fundamental concerns about how new development will respect and preserve the city's architectural traditions and legacies are not addressed.

The draft plan overflows with proposals for new working groups and task forces to deal with planning and other issues. Among the draft plan's policies and actions are recommendations for approximately 20 new groups and 20 new plans or studies. The new groups include a Heritage Tourism Task Force to define and create new heritage tourism experiences; a Cultural Commission to advise the mayor, City Council and other agencies promoting, encouraging and increasing arts and cultural programs; and a Pedestrian and Bicycle Advisory Committee, staffed full-time Bicycle and Pedestrian Coordinator/Engineer, to review projects, policies and plans within the city. Often, the plan overemphasizes the convening of groups at the cost of presenting policy guidance.

In this context, it should also be noted that the draft plan's tendency to name-drop private organizations – some of which may have specific political agendas or development goals – is inappropriate for a public policy document such as this one.

Weak Guidance on Physical Development

The draft plan provides inadequate direction on a number of issues of great importance to the physical development of New Orleans, including those related to land use, urban design, neighborhood enhancement and economic development.

Land Use. The centerpiece of any master plan is land use, and the plan could be more instructive in this

arena. To begin with, the draft plan does not clearly indicate areas that are expected to change and those that are expected to stay the same under the new land use categories. The planners could achieve this by including a map showing "growth and change" areas versus "neighborhood conservation" areas. Such maps appear in master plans for Denver, Sacramento, Washington, D.C., and numerous other major cities around the country and provide an effective way to tell the story that a land use map alone cannot.

On the proposed land use map, meanwhile, residential areas are classified using no fewer than three variables: age (pre-war, post-war), density (low, medium, high) and unit type (single family, multi-family). It is unclear how a new zoning code would mesh with such categories, particularly since so many have overlapping density ranges. The land use categories also leave many questions unanswered. For instance, are the density ranges based on net or gross acreage? Are there any measures of intensity in the commercial and industrial categories? What is the quantifiable difference between Low, Medium, and High Density Mixed Use? The lack of clear direction on such questions reduces the usefulness of the map.

Urban Design. Urban design is an essential component of a master plan. This is particularly true for a city such as New Orleans that is renowned for its architectural heritage and unique urban form. Urban design defines how a city's identity and values can be captured in the visual and physical qualities of its urban landscape. Height, bulk, building style and form, natural features, and other physical relationships in a city are often addressed in discussions of urban design. So are issues such as the design of the public realm (streets, sidewalks, plazas, etc.), public art and the preservation of views.

Urban design has figured heavily in discussions of how to rebuild the city after Hurricane Katrina. It is therefore surprising that the draft plan does not include a chapter on this critical topic. Chapter 14 on land use includes roughly three pages on urban design principles. These principles, however, are general and could be applicable anywhere in the city (or to any city, for that matter). The draft plan also hints at urban design issues in the neighborhoods section in Chapter 5 and in

Chapter 6 on Historic Preservation.

Given New Orleans' complexities, a more extensive discussion of urban design is warranted. A chapter on the subject would provide space within the master plan to address issues related to context-sensitive design in historic areas, distinguishing characteristics of neighborhoods and corridors, and transitions between higher- and lower-density areas such as the medical district and Mid-City.

Neighborhood Enhancement. The chapter on neighborhoods fails to address key issues for the physical development of the city. The beginning of the chapter issues a declaration on the importance of high quality neighborhoods to the success of a city. Yet the chapter does not address policy areas that would be critical for establishing development standards to protect and enhance neighborhoods. These include compatibility, scale, density transitions between land uses, parking requirements, traffic, noise, sites for nuisance land uses, non-conforming uses, alcoholic beverage sales and mitigation of development impacts.

Economic Development. The economic development chapter fails to make a connection between economic development and physical planning. It does not address topics such as the spatial distribution of different industries within the city, or their long-term space needs. It does not seek to answer questions about how much land different job sectors require, and where the optimal business sites are. It does not address where commercial corridors have become obsolete, and it does not set forth a clear strategy to accommodate the scale and impacts of retail and commercial activities that will be in demand among developers in the future. It provides no guidance with regard to how much office, industrial and warehouse space will be needed and where it should be located.

Mission Creep

The draft plan covers a wide range of topics that are not relevant to the physical development of the city. This would not necessarily be a problem if core issues relating to the city's physical presence were addressed. But it appears that the authors, given a limited timeframe for producing the plan, put their energies into these secondary topics at the expense of the plan's primary purpose.

For example, Chapter 10 on Community Facilities, Services and Infrastructure discusses reviewing the tradition of providing free water to all government bodies, improving the police department's web site, recruiting multi-lingual firefighters and better training 311 operators. The draft plan also calls for a ban or a tax on plastic shopping bags and for universal health insurance.

Certainly, it is important to consider a range of policy issues when formulating a plan, but only in the context of their impact on the built and natural environment. Rather than addressing, for example, communication and information sharing within the justice system, the plan should stick with goals and policies related to criminal justice facilities, design standards that enhance street safety, and other points of connectivity between crime, safety and the built environment.

The net effect of the policy tangents is a dilution of the plan's mission, which is to serve as a guide for physical growth and development. Addressing issues that do not relate to the physical development of the city gives the plan an everything-under-the-sun feel.

Environmental, economic and social issues are, of course, important and in the minds of many may be more important than the physical plan for the community. But the master plan is not a new city charter or a social policy document. It is, under law and as a practical matter, a development policy document.

Recommendations

IN SEARCH OF THE MASTER PLAN

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

- Provide concrete policy guidance for the elements mandated by the city charter.
- Fulfill the city charter's mandate to create housing and historic preservation plans that include policy guidance related to the physical growth and development of the city.

- 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.
- Clarify the definitions of the land use map categories.
- 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 USEABLE

In order for policymakers to implement the master plan, it must be arranged in an understandable manner. It must deploy terminology clearly and consistently, and allow policymakers to follow the thread of content from goals for the future to specific actions for achieving them.

The draft plan is difficult to use. Its arrangement is unnecessarily complicated. There are too many levels of headings and a complex typology of terms and titles. More importantly, it is difficult in many cases to follow the logical progression from goals to policies to actions. Terms such as goals, policies and actions are used inconsistently, and to some extent interchangeably. Goals and policies sometimes vary inexplicably at different points within the same chapter. In addition, there's an overabundance of background information. As a result of all this, readers of the draft plan are more likely to become exhausted than elucidated.

Confusion and Inconsistency

The draft plan's goals, policies and actions should be stepping stones from the present to future fulfillment of the plan's vision. They must be clearly articulated, presented in a logical hierarchy and applied consistently throughout the plan.

In too many instances, the draft plan does not clearly explain itself. For example, one of the goals in Chapter 12 on Living with Water and Natural Hazards is "Holistic community standards of resilience from hur-

ricanes and other hazards." The first related policy again mentions a resilience standard and calls for community consensus around it. However, the draft plan never fully explains what a community resilience standard is – making it difficult to implement the goal.

Moreover, many of the policies and actions in the draft plan do not logically follow from the goal they are meant to support. This is a major flaw because it leaves decision makers without accurate or full directions on how to achieve the goals set out for them in the plan. For example, Chapter 10 on Community Facilities, Services and Infrastructure includes as a goal "Costefficient, resource-efficient, well-maintained public facilities and services." Two of the three policies to support this goal do not, in fact, support it. They are: "Create a network of public facilities and service clusters to function as neighborhood civic centers" and "Provide a library system accessible to all neighborhoods with libraries that function as centers of learning and centers of community."

In addition, the line between goals, policies and actions is often murky in the draft plan. Some policies are actually goals: the draft plan lists "Repave or reconstruct all damaged streets within the city" as a policy. Many of the others are actually short-term actions. For example, creating a Housing Working Group is treated as a policy even though creating a

Climate Change Policy Advisory Group is listed as an action. Meanwhile, many of the so-called actions would be aptly described as policies. For example, promoting the development of business and merchants' associations is a policy that calls for action, though it is listed as an action.

As a result of the erratic classifications, a decision maker turning to the plan for guidance is likely to be unclear about what the plan is urging him to do. Mislabeling actions as policies and vice versa also makes it very difficult to determine whether an item in the plan is intended to have the force of law.

There are other inconsistencies relating to goals, policies and actions. As noted previously, each chapter contains a chart with goals and policies at the beginning; a section called "Strategies for Tomorrow" with numbered goals and lists of policies and actions to support them; and an implementation matrix at the end with columns entitled goals, what, how, who, when and resources.

An excerpt of a matrix is provided below. It is from Chapter 6, Historic Preservation.¹⁰ The "what" column roughly corresponds to the bold-faced items listed in "Strategies for Tomorrow." The "how" roughly corresponds to the actions in the plan.

GOAL	WHAT	HOW	WHO	WHEN	RESOURCES
Historic preservation initiatives are supported by a broad range of constituents who share a common vision	Create a community-based, comprehensive citywide preservation plan informed by a broad range of con- stituencies and interests	Convene a Preservation Plan Committee	HDLC	first five years	Staff time
	Develop the plan	Consultant Assistance	HDLC, Committee and partners	first five years	Grants
	Ensure that historic preserva- tion values and interests are coordinated with economic development groups and eth- nic and cultural groups	Ensure cross-representa- tion of interest in initia- tives, redevelopment efforts, etc.	HDLC; public-private economic develop- ment partnerships; others	first five years	Staff time
	Develop principles or guide- lines for contemporary design in historic areas	Convene a committee of architects and preservationists	HDLC; AIA-New Orleans; PRC; National Trust	medium term	Staff time; volunteers

In some cases, the implementation matrices differ inexplicably from the chapter narrative and the chart of goals and policies at the beginning of each chapter. Not all the actions listed in the text appear in the implementation matrix. Policies in the introductory chart often do not appear in the implementation matrix.

Consistent use of terms such as goals, policies and actions, a logical connection between each, and a more liberal use of internal cross-references would greatly improve the plan's usefulness for decision makers, who will presumably refer to it in reports and decisions.

Wandering through the Words

While a description of present conditions is needed to provide context, the draft plan focuses too much on the present. In most of the draft plan's policy-oriented chapters, more than half of the content is dedicated to documenting present conditions. For example, 30 of 64 pages in Chapter 5 and 40 of 74 pages in Chapter 9 address past and existing conditions. Chapter 13 on Environmental Quality describes no fewer than 37 programs or organizations in bulleted lists during its first 25 pages. Not only does this make the plan unwieldy, it shifts the reader's focus to the past and present rather than the future.

The overabundance of background information makes it tempting to criticize the draft plan for being too long. Indeed, the plan is lengthy. But the real problem is not that the plan is too heavy; the problem is that the weight comes from fat instead of muscle.

Recommendations

To ensure the document is clear and useable, the master plan should:

- Organize each element in a consistent, streamlined manner.
- Create a clear hierarchy of goals, policies and actions, with cross-references to the text. Adhere rigidly and consistently to the meaning of the words "goal," "policy" and "action."

- Consistently number goals, policies and actions so they can be easily cross-referenced within and across chapters.
- Significantly trim the background discussions.

MAKING THE PLAN A CREDIBLE PUBLIC POLICY GUIDE

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. It must explore the interrelationships between the elements. It must also prioritize the most critical problems for fuller policy treatment and corresponding actions.

The draft plan, however, ignores certain critical realities. It fails to follow some of its premises and positions through to their logical conclusions, sets unrealistic goals, places overarching areas of concern in silos and fails to set clear priorities.

Ignoring Economic Realities

The draft plan requires an honest assessment of the factors holding the city back and concrete ways the city can best shape its physical presence to address these problems. This is particularly true with regard to economic development.

In its list of economic development challenges facing the city, the draft plan fails to mention perhaps the greatest impediment to attracting new investment in New Orleans: the perception that the city is not a safe place to put dollars due to catastrophic flood risk.

The draft plan also fails to address regional economic competition and confront the factors causing high-earning professionals to depart New Orleans for the suburbs and beyond. It does not provide policies for stemming the flow of city jobs to suburban parishes and other jurisdictions. The plan encourages "policies to make New Orleans a more appealing and affordable environment for creative professionals," but does not propose such policies. ¹¹ Rather, it suggests that the

new paradigm is that jobs follow people. It doesn't acknowledge that this trend is recent and often industry-specific, and that a much stronger tide prevails, particularly in weaker economies: People still follow jobs. If jobs followed people, there would be plenty of opportunities for the thousands of university graduates that the city exports every year.

At the regional level, the draft plan fails to address the cost, geographic, housing and workforce advantages suburban parishes enjoy in various sectors and the areas New Orleans needs to address if it wants to compete. Similarly, while another part of the draft plan addresses spending patterns,¹² the economic development chapter contains no direction on how to stanch the outflow of retail dollars from Orleans to suburban parishes.

Clearly identifying and addressing New Orleans' challenges on the economic development front is a critical first step toward formulating strategies. A credible plan calls for candor.

Disconnections

In significant areas, the draft plan contains data inconsistencies and fails to explore the implications of some of its premises and pronouncements. This not only undermines the plan's credibility, it raises major questions about the future of the city without answering them.

For instance, the "Setting the Stage" portion of the draft plan offers conflicting population estimates for 2009.¹³ It also states that the number of households in a city, rather than the number of people, is the key figure for urban development.¹⁴ While the plan offers population projections for 2015 and 2030, it does not give household projections. Population inconsistencies and the absence of household information make it extremely difficult to assess whether later proposals are logical.

The draft plan asserts that, because of demographic trends, there will be an oversupply of single-family homes by 2013. 15 It also indicates that a significant slice of new demand over the next five to seven years – a critical period for reclaiming neighborhoods – will be in newly constructed "opportunity sites" with denser multifamily housing. 16

The unstated implication is that the prospects for New Orleans' single-family neighborhoods – those that blanket the northern parts of the city and much of the West Bank – are dim, particularly given the damage to many of these neighborhoods from the Katrina disaster. The plan raises this problem, but lets the topic drop, advancing plans to rebuild the city essentially as it is. But if these neighborhoods are not attractive to the market, then rebuilding them as they were is untenable and the prospects for remediating blight are dreadful.

The draft plan's assumptions about demand for single-family housing may be true or false. But if the plan holds them to be true, then it needs to come up with a strategy to reduce excess housing supply and increase demand.

The draft plan also lacks critical data on the number of jobs projected for New Orleans and the region. Such information is basic to determining whether the economic plan and related issues, such as housing needs, are realistic.

Unrealistic Timetables

The draft plan does not provide policymakers with realistic timeframes for executing its directives. An implementation matrix at the end of each policy-oriented chapter characterizes actions as short-, medium- and long-term, but of the nearly 500 actions the plan identifies, 78% are short-term actions to be taken in the next five years.

The draft plan calls for an array of capital upgrades and a slew of new entities, policies, offices, staff positions and programs to be created in the next five years. Included on the list are major projects such as completing the new park on the riverfront, constructing as many as three downtown circular streetcar lines, and redeveloping Iberville public housing to create a new, mixed-income community.

While the city could accomplish much under good leadership, it is simply impossible for New Orleans to fund and implement the well-over 350 actions the plan calls for during the next five years. Furthermore, the absence of a long-range trajectory in favor of short-term strategies undercuts the 20-year purpose of the plan. What

results is a grab bag of goals and projects competing for attention and investment in the immediate future. These factors harm the plan's utility not only as a long-term guide for the physical growth and development of the city, but also as a short-term strategic plan.

The Parts Don't Make a Whole

Currently, the chapters in the draft plan are not tied together into a coherent whole. Each of the policy chapters stands as a silo. This downplays the interconnectedness of issues facing the city and creates gaps in the plan's policies.

First and foremost among all the challenges facing the city are environmental threats and natural hazards such as coastal land loss, rising sea levels and the increasing frequency of major hurricanes. The city's ability to protect itself from these hazards and to assuage investors' concerns about the safety of the city has implications across the board for the physical growth and development of the city.

Similarly, blight remediation is an overarching challenge for the growth of the city. However, it is primarily addressed as a neighborhood issue in Chapter 5. Blight remediation strategy is closely tied with strategies for economic development, land use, community facilities, housing, green infrastructure, natural hazards and historic preservation.

Land use is another overarching policy area. The draft plan provides a detailed land use map, but does not draw connections between it and the goals, policies and actions that pervade the plan. Land use priorities should be informed by the plan's vision and findings, and should be reflected in the guidance the plan offers in every element.

These areas should be recognized as the critical bedrocks of redevelopment and treated as overarching areas of concern that guide the entire plan. Each pertinent chapter should contain a statement explaining how it interrelates with these overarching areas. This would help to draw the chapters together, ensure follow-through and clarify the plan's priorities.

A Failure to Set Priorities

The master plan should clearly convey the city's overarching priorities for its future development. These should reflect the city's principal needs with regard to land use, natural hazards, economic development, transportation, housing, public facilities and neighborhood enhancement.

The Planning Framework briefly discusses the serious financial constraints facing New Orleans. Because local government has limited resources, the plan needs to set priorities. It does not, divorcing the plan from reality and making its implementation unlikely.

The failure to prioritize goals and policies in any meaningful way has implications for the city's capital improvements. The city charter requires the capital improvement plan to be consistent with the master plan. But if the master plan offers up an impractical wish list of capital improvement projects, without distinguishing immediate needs from daydreams, budget planners will look in vain for guidance. More importantly, if funds available to the city are constrained – and they are – the plan should make this clear and establish priorities accordingly. Otherwise, with the varied and numerous proposals in the draft plan, it will set up the city for open season on funding demands.

The draft plan identifies critical infrastructure needs totaling billions of dollars. Yet the plan accords these fundamental needs no greater priority than any other. The Community Facilities, Services and Infrastructure chapter references sewer and drainage repair costs in the billions of dollars, with no clear proposal for covering these costs (and no clear explanation of growth implications if they are not covered).¹⁷ The natural hazards chapter, meanwhile, cites levee repair and coastal restoration costs in the tens of billions of dollars (along with plans to turn canals into park-like promenades).¹⁸

Setting clear priorities not only helps to provide policymakers with guidance, it lets the public know what the plan is about. This should occur in each element.

As it stands, it is unclear whether the city's highest priority is on redeveloping the six "opportunity sites" profiled in Chapter 14,¹⁹ repopulating its damaged neighborhoods, or promoting new urban living opportunities downtown.

In addition to establishing priorities within chapters, the plan should set priorities for the plan in its entirety. These priorities should focus on the community's core needs such as flood protection, infrastructure and blight remediation.

Recommendations

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.
- Set priorities for each element, highlighting which actions are urgently needed, as opposed to desirable.
- Weave overarching areas of concern such as natural hazards, blight remediation and land use throughout the text, using them to inform priorities.
- Provide a short list of the top priorities for the city.

MISSING PIECES

As of the day of the first public hearing on the draft plan, the document lacked chapters on citizen participation and implementation, as well as its appendix. The lack of an implementation chapter makes it all the more difficult for citizens to determine the intent of the plan. The lack of an appendix makes it impossible to check the plan's assumptions against background data. And the lack of a citizen participation piece, when citizens are supposed to be considering the plan and making comments, is not only ironic, it is troubling.

Despite the absence of a citizen participation chapter at the time of this review, BGR will attempt to address the issue here based on the available information.

The 2008 amendment to the city charter requires the City Council to craft and approve a neighborhood participation ordinance within 18 months of the amendment's passage. The charter language focuses on neighborhood-based participation in planning and land use decisions. The ordinance is supposed to create a system for organized and effective *neighborhood* participation in land use decisions and other issues that affect quality of life.²⁰ As part of that mandate, it must:

- Provide for timely notification to a neighborhood of any proposed land use action affecting the neighborhood.
- Provide the opportunity for meaningful neighborhood review of and comment on such proposals.
- Provide the opportunity for meaningful neighborhood participation in the formulation of the master plan or any amendment thereto.

The draft plan mentions the core elements of the community participation program in the Planning Framework.²¹ It lists six of these elements:

- Create a system of district planners.
- Establish district councils.
- For issues of citywide importance, appoint a Standing Advisory Committee.
- Provide administrative and logistical support for the Community Participation Program.
- Hold public review meetings.
- Provide training and capacity building.

The 2008 charter amendment sets the general parameters for neighborhood participation, and the plan should work within these parameters. The intent is simple, but critical: to create an effective line of communication between neighborhoods and the city on land use decisions that affect those neighborhoods. The plan, however, appears poised to create a compli-

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cated superstructure that would introduce a new political layer into the process. It appears to be contemplating a system based not at the neighborhood level – where the vast majority of land use decisions have an impact – but based on the artifice of "planning districts."

The proposal to create district councils could have an enormous impact on how land use decisions are made and how development takes place. Creating such councils might increase participation, but it might also slow down development, over-politicize the process, create new conflicts and increase perceptions of bureaucracy. It might even diminish the voice of neighborhoods in their future.

The citizen participation chapter should therefore focus primarily on doing what such programs do best: providing a system to involve neighborhoods directly in land use decisions and quality of life issues.

Recommendation

To advance the neighborhood participation system envisioned in the city charter, the citizen participation chapter should focus first and foremost on meaningful, neighborhood-level citizen involvement in land use decisions and quality of life issues.

CONCLUSION

For the master plan to fulfill its promise as a guide for the long-term physical growth and development of the city, it needs clear, achievable goals that are supported by strategic policies and prioritized, concrete action points. As released on September 15, 2009, the draft plan does not fulfill its promise.

The draft plan strays from the requirements of the city charter. In many places, it focuses more on convening groups than on guiding the physical development of the city. It is at times unwieldy and incoherent. Its policies are not fleshed out and are, in some cases, not even policies. It fails to recognize and deal with some very serious challenges facing the community. It does not set priorities, provide realistic timeframes or acknowledge financial constraints.

That is not to say that the plan lacks positive points. The vision it sets out for New Orleans in 2030, in general, provides an ambitious destination toward which to work. But in order for the city to reach that destination, the plan must show the way. It does not.

The authors of the draft plan have suggested that the intent of the document is to change the planning culture of New Orleans. We submit that the best way to do that is to create and approve the first truly effective master plan in the city's history.

BGR recommends that the Planning Commission not adopt the draft plan in its current form. Instead, the Planning Commission should take the additional steps necessary to produce a plan that is a clear, focused, coherent and credible guide for the city's physical development over the next 20 years.

The Planning Commission has a few options for addressing the plan's shortcomings. It could send the plan back to the current planning team with instructions to make the major revisions required to address the plan's shortcomings. Alternatively, it could retain an editorial team with planning expertise to work with the current planning team. The editorial team would undertake the major revisions required to convert the draft into a comprehensible document, while the current contractors continue the work needed to fill in the critical gaps.

BGR strongly recommends that the city hire an editorial team of highly qualified planning experts. We realize that this would cost the cash-strapped city money. But having a new set of eyes undertake the necessary revisions is the best way to ensure that the city soon gets the guide it needs for the next 20 years.

The Planning Commission and its contractors embarked on an ambitious time schedule for completing the master plan. They have made much progress toward that end. But at this point, it is more important to get it right than to get it done quickly. With aggressive editing, bold rewriting and fortitude on the policy front, the Planning Commission can get the master plan on track. Throughout this report, BGR has offered recommendations aimed at helping with that process.

END NOTES

1 The June 2008 contract between the City Planning Commission and the contractors included a broader scope of work than that required by the charter amendment. The contract required them to include in the master plan the following elements: Vision & Goals, Land Use, Parks, Recreation & Open Space, Economic Development, Arts & Cultural Management, Tourism Management, Historic Preservation, Transportation, Housing, Community Facilities & Infrastructure, Natural Hazards and Environmental Quality & Energy. The contract was not amended following the passage of the charter amendment, despite changes to its scope and schedule, including the postponement of work on the comprehensive zoning ordinance until after completion of the master plan.

² Miller, Barry, "Plans That Fit the Purpose," in Hack, Gary, Eugénie L. Birch, Paul H. Sedway and Mitchell J. Silver, eds., *Local Planning: Contemporary Principles and Practice* (ICMA Press, 2009), p. 218.

³ City of New Orleans, *Plan for the 21st Century: New Orleans 2030, Technical Plan*, September 2009, p. 5.49.

⁴ Ibid., p. 5.32 and p. 5.50.

⁵ Ibid., pp. 6.12-6.14.

⁶ Ibid., pp. 14.41-14.45.

⁷ Ibid., p. 5.4.

⁸ Ibid., p. 12.23.

⁹ Ibid., pp. 10.23-10.24.

¹⁰ Ibid., p. 6.22.

¹¹ Ibid., p. 9.50.

12 Ibid., Chapter 5.

¹³ Ibid., p. 2.2 and p. 2.28.

¹⁴ Ibid., p. 2.27.

15 Ibid., p. 5.23.

¹⁶ Ibid., pp. 5.24-5.25.

17 Ibid., Chapter 10.

- ¹⁸ Ibid., Chapter 12.
- ¹⁹ Ibid., pp. 14.15-14.27.
- ²⁰ City of New Orleans, *Home Rule Charter*, § 5-411.
- ²¹ City of New Orleans, *Plan for the 21st Century: New Orleans 2030, Planning Framework*, September 2009, pp. 126-127.



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