

**SUBMISSION TO CITY PLANNING COMMISSION  
RE: UNIVERSITY PARKING STUDY OF JULY 14, 2020**

**By Keith Hardie**

Please send the University Area Parking Study to the City Council for further consideration with the changes and expansions recommended below. In addition, please reconsider your recommendation regarding the IZD, so that the *status quo* can be maintained while the study proceeds and legislation is drafted.

While the Staff recommendations provide some possible relief from the symptom of parking shortages, the recommendations fail to address other symptoms of D2Ds, including the loss of affordable housing, the hollowing out of neighborhoods by the concentration of transient rentals (similar to the effects of short term rentals), and the heavy environmental impacts of structures which cover large portions of lots.

**Stop the Bleeding**

The D2D housing phenomenon, which came to New Orleans only last summer, is changing the University Area at a rapid rate. Before the IZD took effect, approximately one property a month was being converted to expensive dormitory style housing. Some of this housing had been lower density student housing, but other properties had provided housing to local homeowners and renters for decades. Student housing has been around for years, but the high density of the D2Ds is far beyond previous expectations. We should not allow these rapid conversions to proceed without examining the effects they will have on housing costs, permeable space and storm drainage, parking and traffic, historic properties, life safety, tree canopy and residential green space, and quality of life issues. The Universities are important to our economy, and it is crucial that the stability of the surrounding neighborhoods be protected in the short run and thoughtfully managed for the future.

**Corporate Housing/A Nation of Renters/End of the America Dream**

Student housing, and housing in general, is no longer a local issue. Wall Street has seen the profit potential of student housing, and you can now buy shares in Real Estate Investment Trusts (REITs) which invest solely in student housing, including EdR (NYSE: EDR), Campus Crest Communities (NYSE:CCG), and American Campus Communities (NYSE:ACC). Smaller investment firms, such as Amicus Properties, LLC, which owns the most D2Ds in the University area (and also owns properties in Charleston, Providence, and Savannah), are also getting in the game. The commodification of student rentals is part of a national trend in which private equity firms are purchasing residential housing and converting it into rentals, taking from working people the primary means by which they can build wealth: home ownership. This trend was exposed in a *New York Times Magazine* article by Francesca Mari entitled “ A \$60 Billion Housing Grab by Wall Street.” As one source told Mari, “Neighborhoods that were formerly ownership neighborhoods that were one of the few ways

that working-class families and communities of color could build wealth and gain stability are being slowly, or not so slowly, turned into renter communities, and not renter communities owned by mom-and-pop landlords but by some of the biggest private-equity firms in the world.” <https://www.nytimes.com/2020/03/04/magazine/wall-street-landlords.html> In short, Wall Street is waging a war over housing, and if you don’t know there is a war, you aren’t winning it.

### **Very Lucrative Investment/Limits Affordable Housing**

These REITs and private equity firms are competing with local residents all over the country for housing. Under current zoning regulations, locals looking for starter homes will lose out because the D2D developers, calculating their return on four and five bedroom units, can afford to outspend locals. These properties rent from \$ 850 to \$ 1500 per bedroom per month, producing total income of \$ 3,400 to \$ 7,500 a month for one side of a shotgun double. The model is to purchase an “under performing” rental, increase the number of bedrooms by minimizing shared living and cooking areas and expanding the structure to every setback, and then jacking up rental rates. D2Ds are so lucrative that developers and their real estate agents are going door to door, sending postcards, and calling and texting homeowners asking to buy their houses.

### **Consequences of D2D Development**

- High profits on the D2Ds are helping increase competition in the housing market and pushing housing prices above what working families can afford, preventing locals from building the wealth that comes with home ownership.
- Long-term locals are being pushed out in favor of students.
- The inflation of rental rates will make affordable housing goals harder to achieve.
- The expansions leave less permeable area to absorb rainwater, increasing runoff and flooding.
- Because the structures are designed to use as much of the lot as possible, they diminish or eliminate green space.
- The scarcity of on-street parking spaces will be increased by the D2Ds, encouraging people to park on sidewalks, add curb cuts, and pave front yards, increasing blight and flooding.
- Noise, traffic, and trash will increase.

- The architectural style of the D2Ds shouts “greed” and is especially unsuited for historic areas.
- D2Ds are the new short term rentals. Like short term rentals, D2Ds hollow out neighborhoods, which become places where no one knows their neighbors. Neighborhoods without neighbors quickly slide into blight.
- The design of these units – four tiny bedrooms with small living and kitchen areas – are designed as mini-dorms and will not be suitable for families and couples or for older residents who would like to downsize or age in place. Known as “purpose-built student housing,” these units are designed for students.

### **What you need to know about Carrollton**

- Carrollton already had a high level of density even before the D2Ds appeared. The CZO states that Historic Urban neighborhoods such as Carrollton are “characterized by a higher density<sup>1</sup> and pedestrian scale environment with limited accommodation for the automobile.” *CZO, Art. 11, Introduction.* By increasing the density of already dense properties, the D2D developers are creating super-dense properties.
- In addition to students, Carrollton has a significant elderly population, and the City should encourage the elderly to age in place in the shotguns and other small housing that has long been part of the neighborhood.

### **Response to the Staff Recommendations**

The study’s recommendations include goals that could reduce the parking impact of the D2D’s, which will be addressed in this section. The staff does not, however, solve the other issues created by the D2Ds, though some of the studies reviewed by the staff point toward such solutions. See the next section for issues not addressed.

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<sup>1</sup> HU-RS1 districts have “higher density and smaller setbacks than seen in the post-World War II areas . . .” HU-RD1 neighborhoods consist of “compact residential areas . . . [with housing] on smaller lots in older, more densely populated sections of the City” ; HU-RD2 districts have “two-family development on smaller lots in older, densely populated urban sections of the City, mixed with detached single-family dwellings.” *CZO, Art. 11.A-C.*

*Increase parking permit zones and decrease total permits*

I live in a residential permit zone, and they may help with parking issues generated by both (1) commuting students, staff and faculty not residing nearby, and (2) dense student housing in the area. The effectiveness of the permits is heavily dependent on enforcement. Enforcement, which issues parking citations, should be self-funding and an income source for the City, but it has nevertheless been intermittent in the past. The recommendation that the number of permits issued to each address be limited is one which also may have merit. Otherwise, one or two units of 3-5 students can, if all are issued permits, take up all of the available onstreet parking, diluting the value of the permits issued to other residents. This suggestion merits more study with the following caveats:

- (1) there must be regular enforcement,
- (2) the number of permits should be allotted by lot frontage and not by address. If a lot has two or more addresses and/or units with large numbers of bedrooms, it is creating parking demand beyond its pro rata share of frontage, and it should not be rewarded for creating the problem. The developer is profiting from the high intensity use of the lot. Make parking for tenants the developer's problem, not the neighbors' problem,
- (3) Many residents cannot afford parking permits and will oppose the creation of new parking permit zones. The price of the permit should be kept low (or be free for those on limited incomes), and the process for obtaining a permit should be made as easy as possible. The program should be self-supporting based on revenue from citations, not revenue from permits.
- (4) When parking is scarce, people often resort to creating (legally or illegally) off street parking, which requires a curb cut. Since only the resident can legally park in the curb cut, a curb cut ends up being a privatized parking space, and the parking pad or driveway it leads to diminishes permeable space. Perhaps properties with curb cuts should have the number of permits available to them limited, encouraging them to use their driveways and leave spaces for those without curb cuts.
- (5) Enforcement, enforcement, enforcement.

*Amend the CZO to allow for collective parking and off-site residential parking*

This might work in some areas, but the University area is completely built up. Any new parking lot would be connected with a loss of housing.

If developers are allowed to provide required off-street parking by providing it on other lots, there is going to be the potential for double assigning, knowing that the tenants will just park in the street when the lot is full. In any event, no one is going to pass up an open parking space near his or her residence in order to park in a lot two or more blocks away.

#### *Town and Gown Relationships*

The universities provide many benefits to the community, and there has been some liaison with neighborhood groups. But when it comes to new construction, the universities usually come to the community with their plans already baked. It never hurts to talk, but stricter parking requirements for the universities would help. Consider requiring the Universities to provide parking in connection with any new facilities.

#### *Alternate Modes of Transit*

Tulane and Loyola do have busses, and Tulane does (or did) have parking at Uptown Square. But, again, drivers aren't going to pass up a parking space near the university for one in a remote parking lot that requires a bus ride unless there are significant carrots or sticks. Realistically, transit in the area is not very good. The St. Charles Streetcar is romantic, but it takes 45 minutes to get downtown. Parking enforcement is key to "nudging" people to take transit.

#### *Long-Term Parking on University Campuses*

Again, this is an interesting idea. But my observation is that students living close to campus tend to use their cars more in the evening and on weekends than during the day and are unlikely to want to walk back to campus to get their cars. Again, it all depends on the "nudges," the carrots and sticks.

#### *HDLC Review*

I am in favor of enhanced HDLC review. Much of the political resistance to HDLC review comes from the landlords, who don't want to be limited in their efforts to expand their properties. The costs and hassle of HDLC approval should be reduced to encourage residents to accept expanded jurisdiction.

## ISSUES NOT ADDRESSED IN THE STAFF RECOMMENDATIONS

### *Loss of Affordable Housing*

Student housing is where the money is. Every unit used for students at the going D2D rate of \$ 850 to \$ 1500/mo per bedroom is a unit that won't be affordable by long term local residents. Unless the City limits this trend or demand drops, we are going to see more and more affordable – or at least inexpensive – properties going D2D. The City needs to look at ways to limit the disease and all of the symptoms, and not just the increased parking demand. The Staff claims that many of the remedies for D2Ds proposed by residents would limit affordable housing in the future, but there will be no affordable housing in the future if D2Ds are allowed to flourish, as the D2D developers will have purchased every “under performing” property in the area and converted it to a high rent gentrified transient rental before an effective affordable housing strategy can be created.

### *Loss of Neighbors (as with Short Term Rentals)*

Perhaps the most consistent objection to Short Term Rentals was the loss of long term neighbors. STRs and D2Ds both service transient populations. Many of the D2D tenants, like STR customers, have no family connection to the City or history in the neighborhood. Both models create a high likelihood of lifestyle clashes between working or retired neighbors and visitors or students prone to late night parties. But it is the loss of long term personal relationships with neighbors that troubled residents most about short term rentals. D2Ds and STRs both destroy patterns of relationship in neighborhood and ultimately both destroy neighborhoods.

### *Loss of Permeable Space and Green Space and Increased Environmental Stresses*

The D2D model expands every property to the setbacks, covering existing open permeable space with additional bedrooms. Gardens disappear because they are just an expense to the developer, and the tenants have little interest in maintaining them. Developers are likely to cut down trees and pave over permeable space to provide parking or decrease maintenance. D2Ds are not green. They are not sustainable.

## **Attachments**

8 Slides from a Power Point  
Chart showing increased residential and parking density

# Architecture of Greed 1: It's all about the bedrooms



# 7307-9 Burthe: From 3 Bedrooms to 16, 0 Parking



# Architecture of Greed 2: Fire Safety?



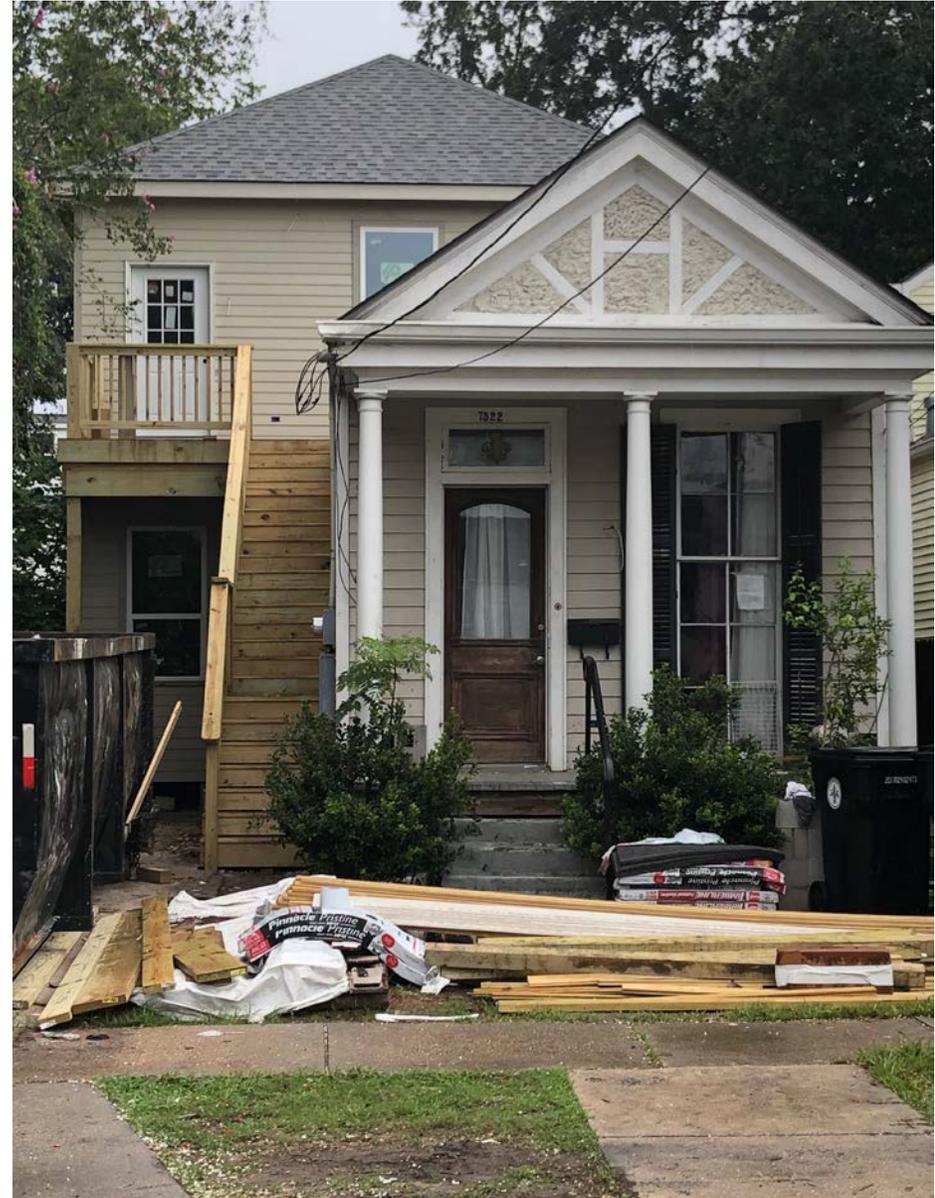
# Hillary St: Two Doubles, 18 bedrooms, 0 Parking



# A Neighbor's Plea for Parking



# Architecture of Greed 3: How to Deseccrate a Shotgun



# AirBnB Destroys Neighborhoods



# D2Ds Destroy Neighborhoods



## Doubles to Dormitories (D2Ds)—Breakdown of Projected Increase in Population Density in the University Area

At July 20, 2020

	Development	Developer	Bedrooms*			Full bathrooms			Toilets**			Offstreet parking places		
			before D2D	after D2D	Net increase	before D2D	after D2D	Net increase	before D2D	after D2D	Net increase	before D2D	after D2D	Net change
1	621 Broadway	Amicus	8	12	4	7	8	1	7	10	3	3	3	0
2	631 Broadway	Amicus	6	12	7	7	8	1	7	9	2	2	2	0
3	1407-09-11 Broadway	Amicus	8	12	4	4	6	2	4	9	5	2	2	0
4	7219 Burthe	Tedesco	4	8	4	2	5	3	3	6	3	2	2	0
5	7305-07-09-11 Burthe	Amicus	3	16	13	2	9	7	3	13	10	2	0	-2
6	7414 Burthe	Tedesco	4	8	4	2	4	2	2	4	2	0	0	0
7	7520-22 Burthe	Tedesco	2	10	8	1	5	4	1	5	4	2	1	-1
8	7612-14 Burthe	Amicus	4	10	6	3	6	3	4	8	4	0	0	0
9	1025-27 Cherokee	Amicus	4	8	4	2	6	4	2	8	6	0	0	0
10	937-39 Dante	Ehrensing	4	7	3	2	5	3	2	5	3	0	2	2
11	817-19 Hillary	Amicus	6	10	4	6	6	0	6	9	3	0	0	0
12	821-23 Hillary	Amicus	4	8	4	2	4	2	2	6	4	0	0	0
13	1025-27 Lowerline	Amicus	4	9	5	2	6	4	2	8	6	2	2	0
14	1320 Lowerline	Amicus	9	12	3	9	9	0	9	10	1	0	0	0
15	1531-33 Lowerline	Tedesco	4	8	4	2	4	2	2	4	2	1	1	0
<b>Totals</b>			<b>74</b>	<b>150</b>	<b>77</b>	<b>53</b>	<b>91</b>	<b>38</b>	<b>56</b>	<b>114</b>	<b>58</b>	<b>16</b>	<b>15</b>	<b>-1</b>
Increase (%)			104.1%			71.7%			103.6%					

The ratio of total bedrooms to total available parking places: 10 : 1

\* Includes only rooms explicitly labeled "bedroom" (i.e., excludes bedroom-like rooms labeled "study," "office," "media room," and "second living room")

\*\* "Toilets" = Full bathrooms plus half-bathrooms (sometimes labeled "powder room" or "PD").

Note: 937-39 Dante is located just outside the bounds of the IZD.

Analysis by S.P. Johnson

Source: onestopapp.nola.gov