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To Whom it May Concern

This summarizes my feedback to the University Area Parking Study published by the City Planning Commission on July 14, 2020 pursuant to Motion M-20-79. This feedback was also shared in an email to CPCinfo@nola.gov.

Feedback to University Area Parking Study published by the Citi Planning Commission on July 14, 2020.

As a resident on the 1400 Block of Audubon Street, I appreciate the City Planning Commission undertaking this Parking Study. However, the study is deeply flawed in its method and its conclusions are not supported by the data. The study's recommendations are ill conceived, unworkable, and, if implemented will NOT improve the parking situation in the neighborhood but make neighborhood parking much worse. In fact, the study reads as if a Wallstreet developer had penned it to allow maximum extraction of short-term profit from our neighborhood to the detriment of the (parking) needs of existing residents.

Below please find a detailed analysis of the study's flaws and its ill-conceived unworkable conclusions and recommendations.

Specific flaws with the study include:

- 1) No actual data was collected regarding traffic flow and use of available parking in our neighborhood. Obviously, such data would have to be collected when all the universities and schools (such as Lusher) are in session. As a longtime resident of the area, I am certain that, had actual data been collected, it would be clear that we are already beyond capacity in this neighborhood for parking with public streets in front of driveways, street corners, residential parking, and no stopping zones regularly completely parked full. This in addition to streets being blocked by parcel and food delivery vehicles as well as ride share cars that are unable to pull into a driveway or otherwise get out of the roadway because there is a solid wall of cars parked up and down on both sides of the street.
- 2) The input from Tulane and Loyola universities regarding their parking capacity and their ability to accommodate additional student, staff, or visitor vehicles was ignored when formulating the recommendations. As stated on p. 72, Tulane is planning to add 700 new beds with zero additional parking, instead renting 600 parking spaces from Loyola. Neither university is planning to add any parking. As I am frequently on both campuses, I can confirm both Tulane and Loyola regularly fill all their available parking spaces and have no land to build additional parking. Some of their parking is also not conveniently

located as they themselves admit (p. 72) and it is expensive. Many students therefore prefer to park in the neighborhood even in residential areas which de-facto limit non-residents parking only between 11AM and 12PM (see next study flaw)

- 3) The study vastly overrepresents the benefit of residential parking restrictions. In our neighborhood on those few blocks that have them, the residential parking restriction is that non-residents are limited to parking for two hours between 9 AM and 2 PM. In practice this is NEVER enforced, because to enforce it would require two well timed visits by an enforcement officer. This also allows a student with a morning class to park until 11AM. Students with classes starting at 12noon can park until late at night despite the limitation as they can park from 12PM to 2 PM under the two-hour allowance for non-residents and after that there are no more restrictions. Also, during the peak time in the afternoon and evening when residents return from work and shopping, students are visiting each other and there are no non-resident parking restrictions. Residents are then unable to park, for example to unload groceries or small kids. And if they do so, they block the road before driving off to look for parking elsewhere in the neighborhood. (Note that most streets in the neighborhood are narrow and one-way and with cars parked right and left, a delivery or share-a-ride car loading passengers will block traffic).
- 4) No input was obtained from the Regional Transport Authority (RTA) whether it is feasible to improve bus and streetcar service to the universities. As the 2017 “The State of Transit” study (<https://rideneworleans.org/analysis/the-state-of-transit-2017/>) has shown public transportation is not a realistic option for most transportation needs in the area and our neighborhood is among the areas where public transport is worst.
- 5) The study’s proposal to limit residential parking permits to two permits per address is ineffective. The study completely overlooks the fact that when developers turn residential family homes into dorms they easily obtain additional street addresses. For example, when Wallstreet-backed developer AMICUS purchased 7307 Burthe Street, it was a three-bedroom single family home with an off-street two-car carport. AMICUS demolished the car port and built a brand-new 8-bedroom double in its place in addition to making the existing home into a second 8-bedroom double - for a total of 16 bedrooms with zero off-street parking. As part of this building project, the developer obtained three additional new addresses for the two double houses (7305, 7309, 7311 Burthe Street). As they now have four addresses, this would entitle them to 8 permits under the recommendation. If we assume only 70% of the students who will live in these 16 bedrooms own a car, there would be 11 additional cars (70% of 16 bedrooms) parking on this already very densely built block compared to when this was a single family home with off-street parking. If, as the parking study recommends each street address were limited to two residential parking stickers, there would still be 8 additional cars on the block because of the newly added addresses and the other three cars would probably be illegally parked. And this does not take into account visitors (and with 16+ students in a dorm, there *will* be visitors), delivery vehicles (Amazon, Pizza, etc.), and ride shares (Uber, Lift, etc.). Because the block can’t absorb all that parking and traffic, there will be significant overflow into the adjacent neighborhood... except that just a few feet away at 7612 Burthe Street, AMICUS has built a similar project, then, around the corner, at 1025 Cherokee yet another, at 1025 Lowerline yet another, etc. etc. etc.
- 6) The Study completely mischaracterizes the density in the neighborhood when it claims on p. 11 that “The area has dense development patterns with minimal setbacks between structures”. There may be a few structures in this neighborhood where that is true, but there are many blocks and entire multi-block areas where this is absolutely false. For example, on our entire street (Audubon Street) and our neighboring streets (Audubon

Blvd, and Broadway Street), there are generous setbacks from the street and between properties. Our house has a circular drive, a car port, and parking for probably about five or six cars on our property, a generous back yard (about 50ft setback vs. the required 15ft etc.) Neighboring properties are mostly very similar. If development in this area were to be allowed with lots entirely covered to the maximum permissible setbacks with buildings that have no off-street parking, this neighborhood will completely lose its character and become a nightmare to park and more generally to live in.

As a result of these flaws, the study's responses to Motion M-20-79 (see p. 73) are completely inadequate. Specifically, the suggested responses to Motion M-20-79 and their problems are:

- 1) "It is good to study what other cities are doing". That's a nice idea, but just one developer, AMICUS, has converted about 10 homes to dorms in this neighborhood in just the last 9 months and there is no end in sight to this. We therefore have no time to waste.
- 2) "Requiring more off-street parking could also trigger additional renovations and partial demolitions...". The exact opposite is true. Requiring off street parking is the only practical to prevent the ongoing flood of homes-to-dorms conversions and the parking problems they bring.
- 3) "Permit developers to rent or lease off-street parking from nearby properties". This is completely unworkable because we are a fully built historic neighborhood with already not enough parking. Most properties on 30' – 50' x 120' lots and regularly sell for \$ 600,000+. And there are no parking lots anywhere.
- 4) "Permit residential parking lots that service residential areas "by-right" in residential zones adjacent to institutional uses". Again, a completely unworkable suggestion as there is no space for this anywhere and both universities are land-locked and fully built.
- 5) "Create a permit for residents to park by blocking their own driveway": Nice idea, but it would have a miniscule benefit at best because most driveways are much narrower than the length of a car, this type of tandem parking is also impractical, many people already do this now, this would rob delivery and ride share vehicles the space they need to get out of the roadway thus blocking streets even more, and finally it would add to the deterioration in the appearance of the street scape by adding to the solid wall of cars down both sides of the streets we already mostly have now. It would also make it harder for emergency vehicles to access properties.

Study recommendations which start on page 75 are also ill considered and unworkable. These include:

- 1) "Create more residential parking permit areas". This would require all property owners to be in agreement. Wallstreet investor owners like AMICUS, however, would never sign off on this as it would contradict their business model. Also, residential parking areas don't help much (see detailed analysis above).
- 2) "Limit the number of parking permits to two at each address". This would solve nothing because, again, residential parking is near impossible to enforce and de-facto limits parking only for one hour (11AM -12PM) because two hour non-residential parking is permitted between 9AM and 2 PM and there are no restrictions outside of that time. Also, as detailed above, developers can easily obtain additional street addresses vastly increasing residential parking permit issuance beyond the space actually available for parking.
- 3) "Improve town-gown relationships. We are not dealing with a town-gown issue here. The universities are not building these dorms, private Wallstreet investors are. The universities also have no interest and no room to create additional parking. Forums

for residents to chat with university representatives could never address this urgent issue.

- 4) "Promotion of alternative modes of transportation". Given the realities of public transport in New Orleans (see detailed discussion above) this suggestion is completely unworkable suggestion and would also not address the situation at hand because student living in these new dorms are all walking to school leaving their cars parked in the neighborhood. Many of these new dorms are closer to campus than university parking garages.
- 5) "Propose universities to create long-term commuter parking rates ... to encourage fewer cars in the neighborhood". Again, completely unworkable given university parking is already at capacity... and that is before Tulane builds the planned additional 700 beds with zero added parking.

CZO/Zoning Recommendations (p. 77) are similarly completely unworkable or, where they are reasonable, do not address the parking problem in any way. Specifically:

- 1) "Consider developing shared parking lots". Unworkable because the area is completely built and it is not feasible to demolish portions of a historic district to build parking lots
- 2) "Consider amending the CZO to allow required residential parking to be provided off-site within 300 ft." Again, completely unworkable because there are no undeveloped areas for miles and we are surrounded by fully built historic districts.
- 3) "Do not amend definition of "family" in the CZO". Given legal precedent, a good recommendation but one that does not solve the problem in any way. It does show that Motion M-20-79 is probably the only chance we have to preserve the historic character of the neighborhood... and to avoid making the parking situation worse.
- 4) "Do not amend current bulk and yard requirements in the study area". This may be the legally expedient thing to do. That said, the historical character of this neighborhood will be lost if more new buildings are built that maximize lot coverage especially with developers maximizing density taking advantage of loopholes in existing zoning laws – all to maximize their profit at the expense of the character of the neighborhood. Of course, this recommendation also does nothing to address the problem at hand.

Finally, the study recommendation NOT to reconsider HDLC review standards and leave this neighborhood as a "partial control" district again does nothing to address the problem at hand and puts Wallstreet investors in the position to continue the destruction of the historic character of the neighborhood for all time so they can make a quick profit.

In summary, it is astounding how flawed the study is and how poorly conceived its so-called recommendations are. If these are adopted, our parking problems are guaranteed to get much worse, the historic nature of the neighborhood will be lost forever, and this area will become unlivable for families and long-term residents.

Please do not hesitate to contact me if you have questions regarding my analysis above.

Sincerely,

Chris Leonhard, Ph.D.

... sent to you by  
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