

PRELIMINARY STAFF REPORT

To: City Planning Commission
Property Disposition Docket: 002/14

Prepared By: Geoffrey Moen
Date: March 31, 2014

I. GENERAL INFORMATION:

Applicant: City of New Orleans

Request: This is a request for the consideration of the sale of the Newcomb Boulevard right-of-way between Saint Charles Avenue and Freret Street, bounded by Squares 69, 76, 77, and 84, in the Sixth Municipal District (PD 3). The strip or portion of ground measures 60 feet, 9 inches front on St. Charles Avenue, 49 feet, 8 inches front on Freret Street, by a depth on side toward Audubon Street and running from St. Charles Avenue to Freret Street, on the other side line toward Audubon Place 1,408 feet.

Why is City Planning Commission action required?

In accordance with Section 6-306, subsection 2 of the *Home Rule Charter of the City of New Orleans*, the consideration and approval of the City Planning Commission is required prior to the sale or exchange of immovable property no longer needed for public purposes.¹

II. ANALYSIS

A. General Property Description and Project Description:

The subject property is the entirety of a public street that extends from Freret Street on its northern or lake side to Saint Charles Avenue on its southern or river side (Figs. 1 - 2). Audubon Street is located one block to the west or in the upriver direction, and Audubon Place is located one block to the east or in the downriver direction. The street varies in width from 60 feet, 9 inches at its intersection with Saint Charles Avenue to 49 feet, 8 inches at its intersection with Freret Street. The length of the street along its Audubon Place or downriver side is 1,408 feet. There are currently sixty-eight (68) lots with frontage on the subject street, which are developed with thirty-five (35) structures. All of the structures with frontage on the street appear to be used as single-family dwellings. The street is presently

¹ Section 6-306, subsection 2 also provides that the City Planning Commission may “impose restrictions as to future use of such property in order to insure that its use will be in conformity with the plans developed or in process of development by the Commission.”

designated as a two-way street with on-street parking only permitted on the western or upriver side of the street.²

The purpose of the request is to change the ownership of the street from public to private in order to allow for the elimination of public access to the street. The property was dedicated as a public street in 1916³ and has remained as such since that time. A permanent barrier in the form of an iron fence was erected by the Newcomb Boulevard Association across the entirety of the street at its intersection with Freret Street in 2006⁴ (Fig. 3). In February of 2013, the Louisiana Fourth Circuit Court of Appeals found that the barrier was erected in violation of the Louisiana Constitution, and it ordered a mandatory injunction to remove the barrier on December 30, 2013.⁵ At some time prior to August 14, 2013, an application for consideration of the property disposition was submitted to the City Planning Commission.⁶

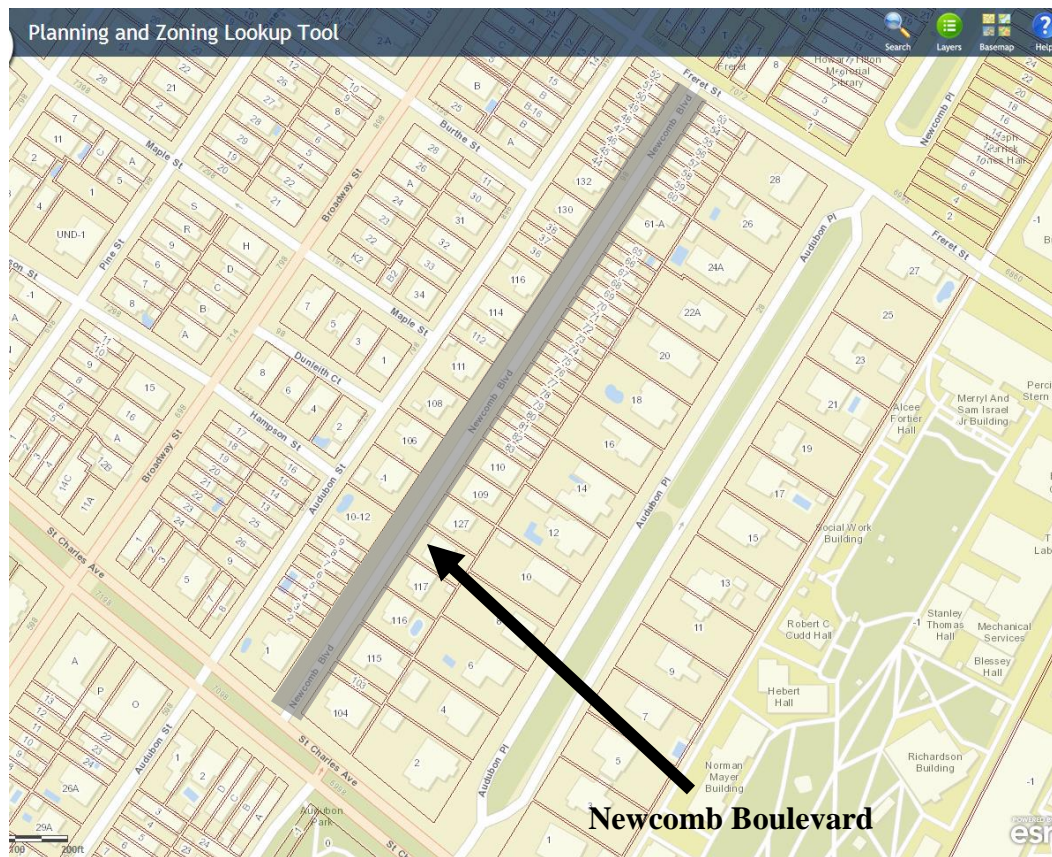


Figure 1. Location of proposed property disposition.

² A proposal to designate the street as a one-way street has been initiated by the City Council. The proposal is discussed in further detail in Section B.4 of the report below.

³ According to the factual background provided in *Huston v. City of New Orleans*, 2012-1171, 2013 WL 744918 (La. App. 4 Cir. 2/27/13).

⁴ Ibid.

⁵ Ibid and *Huston v. City of New Orleans*, 2013-C-1505, (La. App. 4 Cir. 12/30/13)

⁶ No date is indicated on the submitted application, but the request was forwarded to the Planning Advisory Committee and considered by it at its meeting of August 14, 2013.

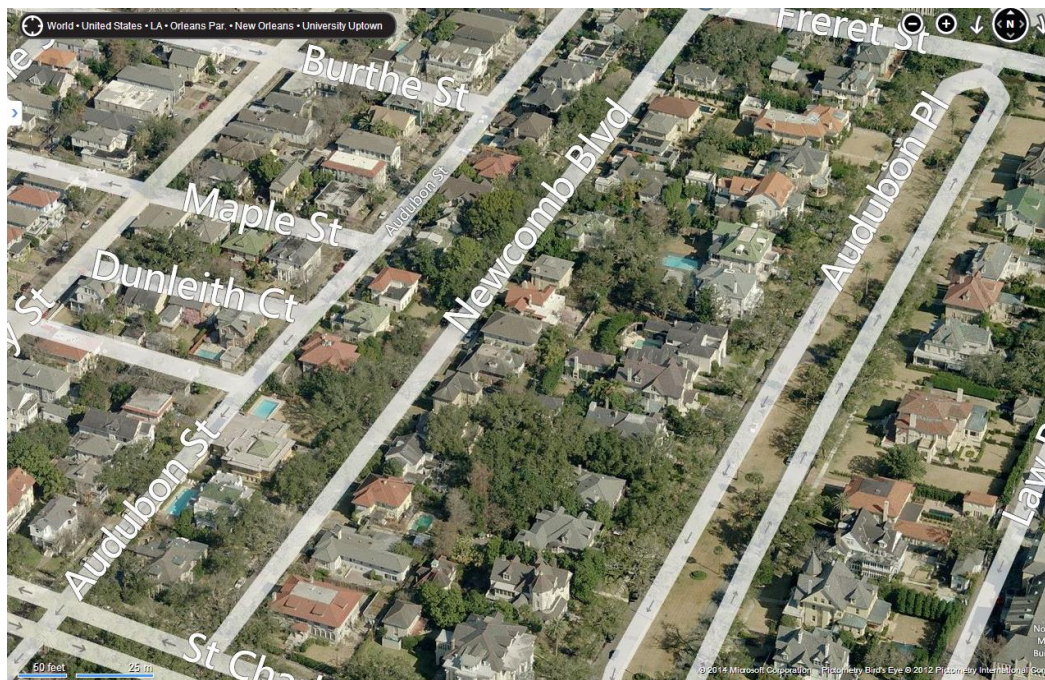


Figure 2. Aerial view of Newcomb Boulevard. Image © 2014 Microsoft Corporation and © 2014 Pictometry International Corp.



a.



b.

Figure 3. Barrier erected across Newcomb Boulevard, a. looking southwest from Freret Street and b. looking northeast from Newcomb Boulevard toward intersection with Freret Street. Photos taken by staff.

B. Criteria for Evaluation

The criteria for evaluation of requests for the disposition of City immovable public property are provided in Chapter 1, Part G of the Administrative Rules, Policies, and Procedures of the City Planning Commission. An analysis of each criterion is presented below.

1. Consistency with the Master Plan and the Future Land Use Map

The disposition of property by the City is not specifically defined as a Land Use Action in Sections 5-404(3)(c) and 5-412 of the Home Rule Charter of the City of New Orleans. As such, the requested disposition is not required to be consistent

with the goals, policies, and guidelines of the future land use designation in which the property is located, as provided in Chapter 14 of the Master Plan. However, Section 5-404(3)(a) of the Home Rule Charter provides the following requirement with respect to property dispositions and the Master Plan:

(3) Legal Effects of Master Plan.

- (a) Following adoption of the Master Plan, no public project or facility and no public utility, whether publicly or privately owned, shall be authorized or significantly altered except in conformity with the adopted Master Plan

The proposed action would result in the significant alteration of a public facility and public utilities, and as such, it may only be approved if it is in conformity with the Master Plan. The Master Plan does not make specific recommendations regarding the acquisition and disposition of particular streets. However, the Transportation and Land Use elements in Volume 2 of the Master Plan do include general provisions that pertain to street dispositions. An analysis of each of the relevant sections is provided below:

Chapter 11: Transportation

Goal 2: Integration of land-use decision making with transportation projects

Policies for Decision Makers: 2.C. Advance projects that enhance connectivity, reduce barriers and improve attractiveness of neighborhoods, commercial sites and public spaces while addressing transportation mobility.⁷

This policy includes four recommended actions that address initiating studies for two major transportation projects, developing landscape design requirements and ensuring safe access to transit stops and other travel generators. Although the subject request is not specifically addressed in the recommended actions, the disposition would run counter to the purpose of the policy by reducing connectivity and allowing for the erection of barriers within the City's transportation network.

The background information and existing conditions discussion that informs the understanding of this policy is provided in Volume 3, Chapter 11 of the Master Plan,⁸ which is reproduced below:

Road networks are also distinguished by the level of connectivity established by the frequency of intersecting streets and directness of the route. With adequate connectivity, traffic flows are evenly dispersed

⁷ *Plan for the 21st Century: New Orleans 2030*, Volume 2, Chapter 11: Transportation, p. 11.1.

⁸ *Plan for the 21st Century: New Orleans 2030*, Volume 2, Chapter 11: Transportation, p. 11.7.

through a network and streets receive the types of traffic that they are designed to handle. If connectivity is restricted to fewer intersections, automobile traffic faces bottlenecks at certain intersections and is concentrated on fewer streets, resulting in congestion and/or larger more complicated intersections and wider streets. Poor connectivity can also encourage out-of-direction travel, which is particularly inconvenient for bicyclists and pedestrians. Emergency incidents, temporary street closures, and evacuation exacerbate congestion in a network that lacks sufficient connectivity.⁹

Based on the policy language and the background information, the staff believes the proposed disposition is inconsistent with this policy in the Master Plan.

Chapter 14: Land Use

Goal 1: Promote smart growth land use patterns in New Orleans and the region.

Recommended Strategy: 1.A. Preserve the overall character of existing residential areas.¹⁰

This strategy includes thirteen (13) actions that address zoning regulations, density and impact transitions, and other aspects of development policy. It does not directly address ownership of streets. However, the surrounding area, along with other pre-World War II neighborhoods throughout the city, is predominantly characterized by a development pattern with structures fronting on public streets. This pattern forms an integral part of the character of the area by fostering connectivity within and across neighborhoods. The staff therefore believes the proposed disposition is inconsistent with the language of this Master Plan policy as well.

2. Appropriateness of current zoning for existing and proposed land uses

The subject property is currently used as a public street right-of-way, and the proposed use is a private street. The majority of the property is located within an RS-1 Single-Family Residential District. A small portion of the property, corresponding to the portion of the right-of-way adjacent to the two (2) adjoining lots that also front on the Saint Charles Avenue right-of-way, is within an RS-1A Single-Family Residential District. Streets are not addressed by the use regulations of the Comprehensive Zoning Ordinance and are appropriate within all zoning districts.

⁹ *Plan for the 21st Century: New Orleans 2030*. Volume 3, Chapter 11: Transportation, p. 11.3.

¹⁰ *Plan for the 21st Century: New Orleans 2030*, Volume 2, Chapter 14: Transportation, p. 14.5.

3. Impact of the proposed purchase, disposition, or lease on adjacent properties and the surrounding area

The proposed disposition would result in the street being changed from public to private ownership. The change in ownership would cause responsibility for the maintenance of the street to shift from the City of New Orleans to a private owner. If the street were acquired by adjacent property owners, the primary impact of the proposal would therefore most likely be increased costs associated with ownership and maintenance. However, it is also important to note that the sale of the street to a private entity could allow for the restriction of access to lots fronting on the street unless a servitude or other agreement were put in place. This concern is discussed further in Section B.10 of the report.

With respect to properties in the surrounding area, the proposal would allow for the street to be closed to public access. Presumably, the new owner would maintain the existing and/or install new fencing and signage at one or both entrances to the street in order to prevent public access. The closure of the street would prevent owners and residents of properties in the surrounding area from being able to use the street as an alternative route between Freret Street and Saint Charles Avenue and would remove multiple parking spaces along the street from use by owners and residents of properties in the surrounding area.

As noted above, public access to the street from its intersection with Freret Street has been closed for several years, although a recent court decision ordered that the barrier preventing such access be removed. The impact of the proposed disposition would be to maintain the current state of the street and to prevent its return to public use and the access and parking opportunities that would result from its reopening.

4. Impact of the proposed action on traffic and the City's transportation system

Description of surrounding street network

The Audubon neighborhood in which the site is located – along with the majority of the surrounding neighborhoods – features an approximately regular street grid characterized by a relatively dense network of interconnected streets that is typical of the city's historic (pre-World War II) urban neighborhoods. However, the street network in the area immediately surrounding Newcomb Boulevard is much more limited. Newcomb Boulevard is one of only two streets (the other being Audubon Street) that connects St. Charles Avenue to Freret Street in the approximately one-half (1/2) mile distance between Calhoun and Broadway Streets. Most of the area between those two streets is occupied by the campuses of Tulane and Loyola Universities, which feature a mixture of pedestrian paths and private drives. Audubon Place, which is located one block to the east or downriver from Newcomb Place, is a private street that is closed to the public and enclosed by barriers.

As noted above, the subject street is presently designated as a two-way street. On-street parking is prohibited along the downriver or eastern side of the street and is permitted along the upriver or western side of the street, subject to residential permit limitations. On March 27, 2014, a calendar ordinance was introduced at the meeting of the New Orleans City Council to amend the Code of the City of New Orleans to designate Newcomb Boulevard as a one-way street with traffic permitted only to move in the “west (lake)” direction.¹¹ The final adoption of an ordinance to effectuate this change would require the removal of the physical barrier across the street, because the presence of the barrier requires vehicular traffic to be able to travel in both directions. The designation would not apply to the subject street if it were converted to private property.¹²

Impact of the proposed action

In accordance with the Policy for City Purchase of Land and for Disposition of City Immovable Public Property,¹³ a Traffic Impact Analysis (TIA) is required to be submitted to the Department of Public Works and the City Planning Commission for any request involving the closure of an existing improved street. The Policy specifies the information and analyses that must be included in the TIA.

The application includes three memoranda prepared by a traffic engineering and transportation planning firm that address the information required in a traffic impact analysis. The memoranda are included as attachments to the staff report. The same firm had also collected similar data in 2004, prior to the erection of the barrier across the public street, and the memoranda provide a comparison between traffic volume and speed data between the two time periods. A summary of the pertinent data is provided below.

¹¹ Ordinance Calendar no. 30,031, adopted March 27, 2014. The street moves in the northeast-southwest direction, with the northeastern-most point being closest to the lake and the southwestern-most point being closest to the river. Based on the format of the table in Section 154-1191 and the other language in the calendar ordinance, the staff understands that the ordinance would require traffic to move only in the direction proceeding from St. Charles Avenue toward Freret Street.

¹² Section 154-2. of the Code of the City of New Orleans defines the term “street” as “the entire width between the boundary lines of every way or place of whatever nature publicly maintained and open to the use of the public for the purpose of vehicular travel, including bridges, causeways, tunnels, ferries and state-maintained highways.”

¹³ Section G.3.A.3 of the Administrative Rules, Policies, and Procedures of the New Orleans City Planning Commission.

Measurement	Year	
	2004	2013
Average Daily Traffic volume (vehicles)	758	396
northbound	464	193
southbound	294	203
85 th percentile recorded speeds		
northbound	34 m.p.h.	22 m.p.h.
southbound	31 m.p.h.	21 m.p.h.
Total vehicles displaced by closure (24-hour period)	362	
Percent reduction in vehicle traffic, 2004 - 2013	48	
Public parking spaces located on street	not indicated	not indicated ¹⁴
Intersection of Broadway St. and St. Charles Avenue		
AM peak delay	not addressed	20.6 sec.
AM peak Level of Service (LOS)	not addressed	C+
PM peak delay	not addressed	22.7 sec.
PM peak Level of Service (LOS)	not addressed	C+
Intersection of Broadway St. and Freret St.		
AM peak delay	not addressed	22.5 sec.
AM peak Level of Service (LOS)	not addressed	C+
PM peak delay	not addressed	27.9 sec.
PM peak Level of Service (LOS)	not addressed	C

The consultant who prepared the analysis reached the following conclusions:

- The imbalance of northbound to southbound traffic in 2013 indicates that through traffic was using Newcomb Boulevard as a “cut-through” between St. Charles Avenue and Freret Street, likely to avoid Broadway Street, the adjacent parallel major street;
- Rerouted traffic has been absorbed in the network, and the portion of the rerouted traffic that has been diverted from Newcomb Boulevard to the intersections of Broadway Street with St. Charles Avenue and with Freret Street is reflected in the 2013 traffic counts;

¹⁴ The memoranda do not indicate the number of parking spaces located on the street. However, they state that the street is currently designated as a Residential Permit Parking Zone.

- The signalized intersections of Broadway Street with St. Charles Avenue and with Freret Street operate within acceptable ranges during peak periods;
- Parking has been unaffected by the closure of Newcomb Boulevard because the entirety of the street has been designated as a Residential Permit Parking Zone, with limitations on parking duration for non-permit holders; and
- The net impact of the closure of Newcomb Boulevard is estimated to be minimal.

The consultant did not provide any analysis or conclusion with respect to the change in the 85th percentile recorded average vehicle speed. It is important to note that the City Planning Commission staff was not provided with a copy of the 2004 traffic impact analysis report with the application from the consultant or from the City.¹⁵ However, the background information provided in the Fourth Circuit Court of Appeal decision pertaining to the closure of Newcomb Boulevard provides a discussion of that report and its recommendations. A summary of the pertinent information from that discussion is presented below:¹⁶

- the total traffic exhibited 85th percentile speeds greater than the posted speed limits (the average speed is not indicated in the decision);
- the use of speed bumps were recommended as a traffic calming measure, but only after further study;¹⁷ and
- the amount of cut-through traffic was normal and not excessive.¹⁸

In a letter addressed to the consultant who prepared the submitted memoranda, the Department of Public Works stated that “We concur with your findings that traffic displaced as a result of the closure of Newcomb Boulevard at Freret are currently being handled by the surrounding streets within minimal impact. The nearest

¹⁵ The staff did receive a copy of a report prepared in April 2005 for the City as an attachment to a letter received by a citizen. The report is titled *Traffic Engineering Services – City of New Orleans: General Meyer Avenue at Odeon Street, Newcomb Boulevard, Pine Street at Hampson Street*, prepared by Urban Systems, Inc.

¹⁶ All information in the following bullets taken from *Huston v. City of New Orleans*, 2012-1171, 2013 WL 744918 (La. App. 4 Cir. 2/27/13).

¹⁷ According to the copy of the report received by the staff, three suggestions were made for further study prior to the installation of physical traffic calming devices. The report stated that “If this measure produces little or no effect, then physical traffic calming devices may be installed.” The report focused on speed humps as the “most widely accepted” form of speed control device and provided cost estimates for their installation on Newcomb Boulevard (p. 20 – 22).

¹⁸ The decision included a footnote (#4) which stated that “The report indicates that statistically, it would appear that since 46% of the total traffic on Newcomb Boulevard is ‘cut-thru’ traffic, a total of 352 vehicles in a 24 hour period in this area of the city is considered to be normal and not excessive.”

signalized intersections are operating at acceptable levels-of-service during the peak hours.”¹⁹

Based on the above information, the staff believes that the closure of Newcomb Boulevard has not resulted in traffic delays at the nearest signalized intersections that are generally considered unacceptable by traffic engineering professionals. However, the staff notes that the submitted analysis does not include an analysis of the change in peak level of service or traffic volume between 2004 and 2013. Furthermore, the 2004 report provided to the staff did not find cut-through traffic to be a problem and did not recommend the closure or privatization of the street in order to address the speeding observed on the street. Additionally, it is important to note that the 2013 analysis attributes the minimal impact of the street obstruction to the ability of the city’s network of connected streets to readily and efficiently absorb diverted traffic. This feature of the city’s transportation system, which is also recognized in the Transportation Element of the Master Plan, would be eroded by the unnecessary removal of a street connection from the network.

5. Public purpose of the proposed action and potential impacts to public services and public safety

Public purpose

The application and attachments submitted therewith do not state a public purpose for the proposed action. According to discussions with the Department of Property Management, the proposal was submitted at the request of owners of properties adjacent to the street who wish to purchase it and convert it to a private street.

The State of Louisiana’s enabling legislation for planning commissions and municipal zoning regulations²⁰ establishes the general powers and duties of municipal planning commissions as making and adopting a master plan for the physical development of a municipality. The legislation states that the general purpose of making and adopting a master plan is to best promote the health, safety, morals, order, convenience, prosperity, and general welfare, as well as efficiency and economy in the proposed development, of a municipality. As discussed above, the City Planning Commission has prepared and adopted a master plan for the city which contains goals and policies that the staff believes do not support the proposed property disposition. The staff has also not received any other information from any party that indicates a public purpose for the proposed action or a way in which it will best promote the purposes of the master plan as set forth in the State enabling legislation.

¹⁹ Letter from Allen M. Yrle, P.E., City Traffic Engineer, to Denis J. Finigan, PTP, dated 28 February 2014.

²⁰ Louisiana Revised Statutes, Title 33, Part IV, Sub-Part A. Section 106.

Potential impacts to public services and public safety

The proposal was forwarded to the New Orleans Police and Fire Departments and the Orleans Parish Communications District through the Planning Advisory Committee review process. No member of those agencies was present at the meeting at which the proposal was considered, and no information was submitted in writing by any of the agencies. As a result, the staff has no reason to believe that the proposed disposition would adversely impact public safety.

With respect to other public services, the subject property is occupied by the following infrastructure:

- a secondary line and a gas main operated by Entergy New Orleans,
- an eight inch water line operated by the Sewerage and Water Board, and
- catch basins, drain lines, manholes, and street lights maintained by the Department of Public Works.

The Department of Property Management submitted language pertaining to recommended restrictions that may be considered by the City Planning Commission for inclusion in any approval of the proposed disposition. The purpose of the language is to preserve the ability of the public service agencies to access and maintain public infrastructure located within the subject site and to ensure that any new owner of the property bear the cost for providing electricity to operate the street lights. The staff therefore recommends that the Commission impose the following restrictions on the future use of the subject property if it approves the disposition:

- The following servitudes shall be established on the property:
 - a.) a servitude to allow for access to and maintenance of all secondary lines and gas mains on the site by Entergy New Orleans, provided that such servitude shall not be required if the cost of relocation for these facilities is provided to Entergy New Orleans prior to the sale;
 - b.) a servitude with a minimum width of thirty (30) feet to allow for access to and maintenance of a water line within the site by the Sewerage and Water Board of New Orleans; and
 - c.) a servitude covering the entire width of the street to provide for access to and use of the drainage system and water main by the City of New Orleans Department of Public Works.
- The purchaser of the property shall be responsible for the following:
 - a.) all maintenance of the drainage system, including but not limited to catch basins, drain lines, and manholes;
 - b.) the ownership and maintenance of all street lights within the subject property; and

- c.) the installation of a separate meter to provide for electric service to all street lights within the subject property.

6. Advice of the Planning Advisory Committee

The Planning Advisory Committee (PAC) considered the request at its meeting of August 14, 2013. After a brief discussion, the committee adopted a motion of no objection subject to further review by the City Planning Commission, Entergy, the New Orleans Fire Department, the Sewerage and Water Board, the Department of Property Management's Division of Real Estate and Records, and the Department of Public Works. As noted above, the Department of Property Management submitted language in consultation with the Department of Public Works, the Sewerage and Water Board, and Entergy which has been incorporated into recommended restrictions above. The staff also recommends that the Commission impose the following restriction if it approves the disposition in order to ensure that services provided by the Department of Fire are not adversely affected:

- The property shall only be disposed upon the approval of, and subject to any conditions imposed by, the New Orleans Fire Department.

7. Potential future public use of property

The subject property was dedicated as a public street in 1916, and has provided vehicular and pedestrian access to multiple private properties since that time. The subject street also serves as the only connection in the City's street network between Freret Street and Saint Charles Avenue from Audubon Street to Calhoun Street. The potential future public use of the property is to remain a public street providing such access.

8. Compliance with Capital Improvement Plan

The subject property is not part of any project approved in the Capital Improvement Plan and therefore would not conflict with the Plan.

9. Street naming policy (for the naming of new streets)

The request does not involve any proposal to rename a street.

10. Any other applicable CPC policies or small area or special studies

It is customary for the City to require the resubdivision of street rights-of-way and other portions of property owned by the City as a condition of any disposition of property by the City. The purpose of such a resubdivision is to delineate the boundaries of the property and to assign it a lot number or designation in order to allow for its clear identification, assessment, and taxation. All requests for subdivisions within the city are subject to the provisions of the New Orleans

Subdivision Regulations. Therefore, if the property disposition is approved by the City Planning Commission, the staff recommends that the Commission impose the following restriction as to the future use of the property as a private street:

- The subject property shall be subdivided in accordance with the provisions of the New Orleans Subdivision Regulations.

As noted above, the sale of the street and its conversion to use as a private street could allow for the establishment of restrictions on access to properties with frontage on the street. Section 5.1.4 of the New Orleans Subdivision Regulations requires that “No subdivision will be approved by the Commission unless it creates a lot or parcel having its principal frontage and access from an officially approved street or place, public or private.” Additionally, Section 5.2.3 of the New Orleans Subdivision Regulations requires that a “Homeowners Association or a similar responsible entity must be established to provide for the permanent maintenance of all private streets and that a proper notation to that effect be placed on the final subdivision plan and recorded.” Therefore, if the Commission decides to approve the disposition of the street, the staff recommends that it impose the following restrictions in order to ensure compliance with the New Orleans Subdivision Regulations:

- Access to all properties with frontage on the current public street shall be maintained through the establishment of a servitude or other restriction, subject to the review and approval of the Department of Property Management.
- A responsible entity must be established to provide for the permanent maintenance of the private street, and a notation to that effect must be indicated on the Final Plan of subdivision as approved by the Planning Commission and recorded in the office of the Clerk of Civil District Court for the Parish of Orleans.

The staff is not aware of any other City Planning Commission policies or small area or special studies relevant to the requested property disposition.

III. CONCLUSION AND RECOMMENATION:

Property Disposition Docket 002-14 is a request to consider the sale of the Newcomb Boulevard right-of-way between Saint Charles Avenue and Freret Street. There are approximately sixty-eight (68) lots and thirty-five (35) single family dwellings with frontage on the street. The street was initially dedicated as a public right-of-way in 1916, and has functioned as such ever since that time. A barrier was erected across the street at its intersection with Freret Street in 2006, but the barrier was found to be in violation of the Louisiana Constitution and its removal was ordered by the Louisiana Fourth Circuit Court of Appeals in December 2013. The proposed property disposition was submitted to the City

Planning Commission at the request of owners of adjacent property who wish to convert the street to private property in order to maintain the barrier and limit access to the street.

A traffic study in 2004 found that approximately forty-six percent (46%) of the traffic on the street was not associated with residents of the street and that the average vehicle speed exceeded the posted limit. However, the analysis at that time noted that the proportion of non-resident users of the street was not unusual and recommended that speed bumps be instituted following further study. A subsequent traffic study in 2013, conducted several years after the erection of the barrier, found that two hundred forty-six (246) vehicles per day had been diverted to other streets as a result of the barrier, but that the diversion had not resulted in unacceptable traffic delays or levels of service at the two signalized intersections nearest to the site.

No other agency of the City's government has expressed a need to maintain the street as public property. However, it has also not been demonstrated that the conversion of the street to private use is necessary in order to best promote the health, safety, general welfare, and efficient and economic development of the city. The street forms an integral part of the city's network of interconnected streets, which is supported by the goals and policies provided in the Transportation and Land Use elements of the Master Plan. As a result, the staff believes the proposal is inconsistent with the Plan for the 21st Century. In accordance with the Home Rule Charter, the disposition of a public facility may only be approved when doing so would be in conformity with the Master Plan.

The staff therefore recommends **DENIAL** of Property Disposition 002-14.

IV. REASONS FOR RECOMMENDATION

1. The subject street forms a part of the city's network of interconnected streets.
2. The sale of the public street and its conversion to a private street is not necessary in order to best promote the health, safety, morals, order, convenience, prosperity, general welfare, and efficiency and economy in the process of development of the city.
3. The requested property disposition is inconsistent with the goals and policies of the *Plan for 21st Century: New Orleans 2030*.

ATTACHMENT: Official Zoning Map of site and surrounding area

Newcomb Boulevard