

**APPENDIX A**

**Public Comment and Responses Summary**

## Appendix A

### Public Comments

#### Environmental Scoping for the Replacement VAMC Design Alternatives

Public comments were received during the public meeting on 16 April 2009 in New Orleans, Orleans Parish, Louisiana. Additionally the public provided comments by submitting emails, letters, and website postings. All comments were reviewed and those pertinent to the environmental scoping of the project are summarized below. Every attempt has been made to adequately respond to these comments and incorporate them into the Site-Specific Environmental Assessment (SEA). Public involvement in development of this SEA is discussed in Section 1-3.

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#### Specific Design Alternatives

Approximately 26% of the comments related to discussions about the specific design alternatives. These comments are summarized below:

- Alternatives # 1, 3, and 4 lose out aesthetically as they appear as "walled" fortresses and are too institutional in arrangement.
- Alternatives # 3 and 4 have no open visual corridors across a 3x3 block area.
- Houses should be incorporated into Alternatives # 1, 2, and 3 as they are in Alternative # 4.
- Odd angles on Alternatives # 2 and 3 alienate the complex from any congruency with the city. There are not enough advantages for using this kind of layout.
- Only Alternative # 4 attempts to use a great setback and residential houses to mitigate the impacts to the neighborhood across South Rocheblave Street. The other alternatives make no attempt to mitigate impacts.
- Handouts from the 16 April 2009 meeting for Alternatives # 2, 3 and 4 all contained a statement that "hardened walls separating below grade parking from occupied space replace the 50 foot security setback requirement." However, the public was repeatedly told that the need to build this new facility on a much larger site than it previously occupied was justified in part by security setback requirements; yet now we learn that hardened walls can replace those setback requirements.
- On 13 March 2009, VA responded to consulting parties that the staff parking garage had been reoriented with the short side facing South Rocheblave Street to minimize the impacts on the adjacent neighborhood, but that is only true for Alternative # 4. In the other alternatives, the staff parking garage has the long side toward the neighborhood.

### **Alternative # 1**

- Only Alternative # 1 has some relevance to the existing city street grid. Why can't Banks Street be retained?
- Would like to see some of the houses retained for use for rehabilitation and transitional living as in Alternative # 4.
- The Alternative # 1 diagram posted on the website prior to the 16 April 2009 meeting showed the long side of the staff parking garage parallel to Banks Street, however the handout at the meeting showed the long side of that garage parallel to South Rocheblave Street.

### **Alternative # 2**

- Alternative # 2 makes best use of green space and natural energy efficiency.
- Alternative # 2 is best for access without the spine because parking is closer to the facilities. The spine makes for longer walks for patients and staff.
- Like the central parking, should be topped with rooftop green space courtyard.
- Like the pedestrian walkway from Galvez and Canal across to Rocheblave - appears friendlier, welcoming and less fortress in appearance.
- Like the walkthrough/visual corridor from Tulane to Canal between staff parking and main building.
- Like the soft continual change in building elevation.
- Like the softer face on Canal Street.
- The handouts present a variety of potential uses for the Dixie Brewery for Alternative # 2. Which is correct?
- The handouts give an elevation of 20 and 25 feet for the ramp up to the main entrance. Which is correct? In either case this is an elevation of two stories. How does an individual arriving via public transportation enter the facility? Must they climb that ramp?
- What would be on the roof of the underground parking structure?
- The diagonal arrangement may maximize natural light and minimize glare, but it has no relationship to the existing New Orleans street grid. Concerns about "energy and sustainability" would be better served by choosing an alternative location that does not involve demolishing nine square blocks of an historic neighborhood and dumping the debris in a landfill.

### **Alternative # 3**

- Like the dynamics of the diagonals in Alternative # 3. The others are static.
- This alternative is unsuccessful because it bears no relationship to the existing street grid. It also fails to "provide an iconic face at the corner of Canal and Galvez" as described in the hand-out.
- There are two potential uses for the Dixie Brewery listed on the handouts, which is correct?

### **Alternative # 4**

- Composite Alternative # 4 is preferable. It is more consolidated and easier to get around for both staff and patients.

- Alternative # 4 is superior because it keeps the houses and pump station and steps down (transitions) to the neighborhood.
- Alternative # 4 shows an excellent response to comments submitted in the Section 106 design review meeting.
- Alternative # 4 is aesthetically tolerable.
- The central corridor in Alternative # 4 allows for access in bad weather.
- Alternative # 4 has some relationship to the existing street grid, but includes an odd angle to apparently break up the long hallway. Maybe there are more creative solutions to break up the superblock and allow more flow through the complex.
- Alternative # 4 is the only one to incorporate the historic preservation measure or relocating and reusing historic homes that was touted so proudly. However it is disappointing to see only eight token houses being potentially reused. On 13 March 2009 VA stated that the reuse of such structures was constrained because their acquisition and use would make them federal facilities and thus require they comply with federal handicap accessibility and fire code guidelines. It is hard to believe these issues cannot be resolved to adapt historic buildings to meet current federal codes.
- There are two potential uses for the Dixie Brewery listed on the handouts, which is correct?

RESPONSE:

**Design / Aesthetic Comments:** VA appreciates the comments and suggestions regarding the designs and aesthetics. All comments have been considered during the ongoing design process. Issues addressing aesthetics are thoroughly detailed in Section 3.2 of this SEA.

**Street Grid / Residential Structures / Alternative # 4:** Alternative #4 was developed in response to comments from the January Consulting Parties meeting. This alternative incorporates both new characteristics as well as features from each of the other three alternatives. This allows this alternative to present a greater level of detail. Section 2.3.4 of the SEA details the comments which contributed to the development of Alternative #4, including addressing the relationship of the VAMC buildings to the existing street grid. Though the use of existing housing structures was only presented in Alternative #4, VA would consider incorporating them into any of the other alternatives were one of those chosen for the final action. The number of residential structures retained would be determined by facility requirements and project budget.

**Banks Street: Alternatives to Closing Internal Roads:** Because of federal security requirements, facility needs, and the design configuration, it is not possible to leave any of the internal roads open on the replacement VAMC campus.

**Materials Presented at Public Meeting:** Unfortunately, due to the pace of ongoing design changes, there were some inaccurate statements presented on the handouts at the April public meeting. The errors came to VA's attention during breakout session

discussions and corrections were shared with the public at that time. Updated versions of the handouts were posted to the project website immediately following the meeting. The following provides corrections to statements presented in the handouts presented in the April meeting.

- In Alternatives #1, 3, and 4 the entrance driveway would not ramp up more than 3 feet from current surface level. In Alternative #2 the entrance driveway would ramp up 25 ft, above the below grade parking, to the main entrance. A pedestrian entrance would be available at the existing ground level.
- While hardened blast-resistant walls would meet federal physical security requirements in lieu of a stand-off or setback distance, they are not the preferred method. Hardened walls are allowable as an alternative solution when a setback distance is not available or impracticable. They are most often used when existing facilities are renovated and must meet the federal standards but no setback distance exists between buildings already previously constructed.
- In the case of Alternative #2, landscaping would be developed on top of the belowground parking structure.
- In Alternative #1 Dixie Brewery would be considered for use as the rehabilitation and transitional living facility. In Alternatives #2 through 4, Dixie Brewery would be reused as research facilities. Ultimate use of the structure, however, is dependent on the feasibility study which will be completed after VA has been granted access to the building.
- The staff parking garage in Alternative #1 was rotated initially to provide a wide, contiguous, green space corridor in the center of the campus. The garage was rotated in Alternative #4 in response to comments regarding concerns about the potential impacts of having the long side facing the adjacent residential neighborhood.

A complete, detailed description and diagrams for each of the alternatives is available in section 2.3.

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### **General Design**

Approximately 16% of the comments related to general design issues. These comments are summarized below:

- The facility should use a lot of glass, especially for the concourse.
- The use of color should be utilized to optimize well being.
- Bring design site models to community centers, churches - after Sunday morning services - donuts & coffee - most public need model to visualize concept could be as simple as white with green trees.
- Use solar collection.
- The designs have nothing to do with sustainability.
- Build up, use land more efficiently. Build the highest hospital in the south.

- This design is a suburban design, it's not an urban design, it's totally inappropriate. VA is taking advantage of New Orleans in imposing this on us.
- The old site was supposedly unacceptable because of the set back issues, but these designs seem to repeat the problem.
- Nothing in any of the four schemes fits the neighborhood, the needs, or the future of New Orleans, and certainly not of the veterans.
- All the renditions and schemes are architecturally abhorrent.
- Do not believe the architects have spoken to the people who have to maintain the buildings, offer services in them, or to the patients.
- Nothing in the four design alternatives fits with the historic nature of the surrounding neighborhood, the Mid-City National Register Historic District.
- There is nothing exceptional or interesting in the preliminary designs, they are simply functional. There is no relation to the existing historic city and neighborhood.
- The proposed designs are ugly and inappropriate for the neighborhood in which they are being placed. They are reminiscent of the worst forms of "urban renewal" that have decimated many cities in the 1970s.
- Ask that homeless services be centralized at the proposed location, that a well-thought, forward-thinking plan be integrated into the VA complex. This is quite possibly a once-in-a-lifetime opportunity to design a homeless program on the cutting edge, a model for the whole world.
- What happens if they encounter Indian and/or slave burial grounds, artifacts, etc. Will they have to redesign the entire process?

RESPONSE:

**General Design:** Materials presented at the April 16 public meeting focused on the configuration of the buildings and did not explore the aesthetic and architectural components of the facility. Design aspects of the replacement VAMC, including discussion of building materials, color, sustainability, building massing (size, scale, etc.), setback, and relationship to the surrounding historic neighborhood and urban setting are discussed in detail in Section 3.2.2.2. The building configurations, layouts, and architectural features, were designed through numerous focus group meetings with both VAMC staff, patients, and veterans. Various building height scenarios were evaluated to best integrate the needs of a medical campus into the surrounding community. The height scenario selected was determined to be more compatible with the surrounding community, was more efficient for patients and staff, and is more suited to improve healthcare outcomes (due to ease of patient access to outdoor areas) than taller buildings would be.

Exterior building materials will include several different types, including glass, metal frame and metal panel. As presented in Section 3.2 of the SEA, VA has made extensive efforts to merge these materials with the surrounding neighborhood and district in an aesthetically pleasing manner. VA has also used the established set-back levels, which are much larger than those at the existing campus, to step down to the adjacent residential neighborhoods. It was established early on in the design process that very tall buildings

would not only clash with the surrounding area, but are also not recommended logistically for this type of facility. Aesthetic considerations including, building materials, colors, massing and greenspace have been discussed extensively in the SEA. Every effort has been made to incorporate suggestions by the public, wherever possible. For example, many features of the preliminary designs reflected comments submitted by the public and the Consulting Parties during the SEA process such as:

- Buildings were reoriented to align with the existing street grid;
- Overall massing of the VAMC was moved closer to the Canal and South Galvez Streets intersection;
- Refined architectural details and articulation of the building massing (size, shape, and footprint) to reduce the impact of the VAMC within the context of the neighborhood (figures 2-3 and 2-4);
- The replacement VAMC has been planned to be able to accommodate both vertical and horizontal future growth to be able to maintain itself within its current site boundaries and retain the lower scale massing of the facility;
- The finished floor elevation of the replacement VAMC has been reduced by two feet, from 3.3 ft to 1.3 ft above msl. This elevation will be above the 100-year flood level established by FEMA and will meet the City of New Orleans requirements for the Advisory Base Flood Elevation (ABFE). This modification reduces the amount of fill required on the site, creates a better transition to the existing grades around the site, and provides better accessibility for patients and visitors;
- Most site drainage will be collected in a new underground drainage system and routed to the South Galvez Street box culvert. Vegetative roofs, water harvesting, and bio-infiltration planting areas will be utilized to slow the rate of water runoff and improve the quality of the water exiting the site;
- A continuous architectural edge has been established along Canal Street respecting and reinforcing the existing Pan-Am Building height and setback, and reflecting the existing character of the street;
- Central concourse was shortened at the lower levels to connect only to the primary areas where patients and visitors will be served (figure 2-4);
- A 100 -foot buffer has been established along South Rocheblave Street. The staff parking garage has been set-back approximately 160 feet to provide transition space to the adjacent residential neighborhood (figure 2-4), addition of landscaping will further soften the transition;
- The design of the rehabilitation and transitional living building has been refined to respond more directly to the residential scale of the adjoining neighborhood through the scale and mass of the building and the introduction of indigenous material and architectural details in addition to the location and placement of the residential structures to be reused. (The number of preserved residential structures to be reused for transitional living has been reduced to two to four due to programmatic needs and project budget (figure 2-4));
- The courtyard spaces between buildings on the replacement VAMC campus have incorporated design concepts and indigenous materials from traditional New Orleans gardens, including low walls, hedges, fences, stone and small unit pavers, freestanding planters, and South Louisiana plant material;

- Veteran and local art would be integrated throughout the replacement VAMC campus, both inside and outside, and would be organized around a variety of themes aligned with prevalent art mediums of New Orleans and South Louisiana;
- The existing Sewage Pumping Station Number 15 has been incorporated into the replacement VAMC campus;
- Access to the staff parking garage relocated closer to Palmyra Street to eliminate impacting the live oak trees on Banks Street (figure 2-4);
- CEP/Warehouse was reoriented to preserve existing live oak trees (figure 2-4);
- The CEP / Warehouse has been setback along Tulane Avenue to preserve the view of the Dixie Brewery when looking to the northwest while still reinforcing the architectural edge of the street.
- The height of the research building has been reduced in order to minimize visual impacts on the Dixie Brewery;
- A colored metal panel has been introduced on the first floor exterior of the Research building to visually integrate this building with the brick color of the Dixie Brewery;
- ;
- The replacement VAMC site plan has been closely coordinated with the future UMC site plan to ensure alignment of site access and to take advantage of public space connections across both campuses.

**Homeless Program:** The purpose for the replacement VAMC is to serve the medical needs of the veteran community throughout southeastern Louisiana, including the needs of homeless veterans. There are other facilities and programs in place, however, to service the all-encompassing needs of homeless veterans.

**Archaeology:** As previously discussed in the PEA, the project site has a low potential for intact, prehistoric archaeological sites and a high potential for intact historic archaeological sites. In accordance with PA Stipulations VII.B.1, VII.B.2, and VII.B.3, VA developed an Archeological Probability Model and Disturbance Study (APMDS) to determine the prehistoric and historic context for the archeological investigations. Using this data and the generated maps, VA, in consultation with the SHPO, has identified locations at which to conduct archeological testing. The archaeological investigations will be conducted according to this plan and are discussed in detail in Section 3.9.1.2.

If human remains are discovered during the archaeological survey, demolition, or construction, all work in the vicinity will be stopped immediately. If, at the time of discovery, the remains are on federally owned land and are determined to be American Indian, the responsible federal agency shall consult relevant federally recognized tribes to develop a plan for the appropriate treatment of those remains in accordance with the Native American Graves Protection and Repatriation Act (25 USC § 3001 et. seq. as appropriate) as stipulated in the PA. If the remains are determined to be non-native, or if the remains are not located on federally owned land, the responsible agencies shall follow the procedures outlines in the Louisiana Unmarked Human Burial Sites Act (R.S. 8:671 et. seq.). If the remains are not located on federally owned land the responsible agencies shall also notify the City Attorney's Office, the New Orleans Police Department and Orleans Parish Coroner's Office. Local law enforcement officials shall assess the

nature and age of the remains. Disposition of the remains would be pursuant to Federal and state laws based on the nature and age of the remains as determined by local law enforcement officials.

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### **Site Selection**

Approximately 14% of the comments related to site selection. These comments are summarized below:

- Why didn't VA choose one of the other site alternatives?
- VA should go on the LSU proposed site and LSU should go back in Charity Hospital as proposed in the RMJM Hillier plan.
- Has the VA considered acquiring the Charity complex and rehabbing the old VA complex instead of building on the proposed site? This seems to solve most problems and would be cheaper.
- VA needs to use current site; implode the old facility and build up.
- We did not realize that the government (VA) can just take over properties without a vote from the people. Is this a government of the people or of the government?
- This site is inappropriate for the type and size of the hospital.
- Choice of this site is not responsive to public opinion.
- Think Tulane Hospital will be cut off by this plan/placement.
- Concerned about impact to downtown/Central Business District. Abandoning downtown creates more blight in downtown, high-rise blight.
- Another location would be a better choice (Lakeland Hospital in east New Orleans, other vacant hospitals, other empty buildings in downtown, or vacant land downtown or elsewhere in city) rather than demolishing an historic neighborhood.
- Destroying this neighborhood will destroy affordable, livable housing and it's unclear where some of those residents will move to. Morally wrong and insensitive.
- Most people did not come here to talk about how the design will fit into this area.

### **RESPONSE:**

While VA appreciates comments in regard to the site selection, these issues were previously addressed during the Programmatic Environmental Assessment (PEA) process. There were numerous opportunities for comment on site selection during preparation of the PEA. VA carefully considered and responded to all comments received during that period before making the final site selection on 25 November 2008. The purpose of the current Site-Specific Environmental Assessment (SEA) process, including the public meeting on 16 April 2009, is to evaluate the environmental impacts surrounding the construction and operation of the replacement VAMC on the selected site

(the parcel bounded by Tulane Avenue and Canal, South Galvez, and South Rocheblave Streets).

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### **NEPA Public Meeting Format**

Approximately 11% of the comments focused on the format of the NEPA public meeting and the use of individual breakout sessions rather than an open mike comment period. These comments are summarized below:

- Do not like how the meeting was conducted. People were not allowed to participate in an open discussion, to ask questions and hear the answers to questions collectively. Transparency has been diminished.
- Lost an important opportunity for the citizens here to be educated about what's going on here.
- The agencies don't want to hear what the public says. Meeting format was designed to silence the public.
- The meeting format subverts the democratic process. Want a process that is democratic, truly open to public comment and responsive to that input.
- Conduct of the meeting was an insult to veterans.
- Question whether the meeting format is a legal process and whether it satisfies NEPA requirements.
- Format of meeting was advertised differently in public notice.
- Talking about the ordering of the buildings is much less important than talking about the actual issues at hand. Disgusting to claim "civic participation" by inviting people to farcical discussion of which buildings are going next to which other buildings.
- In none of the breakout groups were people taking notes.
- No complete record was kept of the commentary.
- Could have had some open discussion and then breakout sessions as a compromise.
- Actually like the break out session idea. Think the moderators did a nice job handling the crowd.
- Think it went quite well considering the situation/circumstances.
- Meeting date conflicted with previously scheduled master planning meeting for District 1 where existing VAMC is located. Short-sighted and inconsiderate not to plan NEPA meeting on separate date.

### **RESPONSE:**

VA and the design team were and are still very interested in public input regarding the design of the replacement VAMC. As stated in the public notice:

On April 16, 2009, VA will be holding a public information meeting to present the design alternatives for the replacement VAMC. The purpose of this meeting

is to engage the veterans, general public, local businesses, associations, stakeholders, affected governmental agencies and other interested parties to solicit relevant input and provide timely information throughout the environmental compliance review process.

The format of the meeting was not presented in the public notice. Through careful consideration, VA and its design and environmental team selected the breakout session format as the process through which the greatest amount of information could be shared and through which the public would have the greatest opportunity for participation. It is VA's opinion that this kind of meeting format is fully compliant with NEPA requirements.

The breakout session format provided the maximum opportunity to facilitate communication by allowing the public the largest chance for participation. The use of breakout sessions allowed the participants to point to and discuss features on several design alternatives at once, thus facilitating communication with the VA team. Numerous VA, design, and environmental representatives were available at each station to engage in an open discussion with anyone wishing to ask questions or make comments. This format also provided the opportunity for more members of the public to interact with the VA team and express their comments and questions than would have been possible in an open mike forum. Additionally, it allowed participants a more extended comment time period as there were no time restrictions. Time restrictions are unfortunately necessary in an open mike format in order to allow the highest possible number of speakers.

Comments and questions from the public were recorded at each station and are included in this appendix. Formal comments and questions were recorded by a court reporter at a separate, dedicated station. Comments and questions shared at the breakout session stations were recorded by staff members. A summary of all comments received by the court reporter, at the stations, and via email, regular mail, and in-person visits following the meeting are included in this appendix.

It is regrettable that this meeting regarding the NEPA process for the replacement VAMC conflicted with the District 1 master planning meeting. While VA appreciates and acknowledges the importance of the Master Planning process in New Orleans, the site selected for the new Veterans Affairs Medical Center is located in District 4, not District 1. The VAMC design alternatives presented and discussed at the NEPA meeting may have been useful for those participating in the District 4 meeting the following week, therefore it was beneficial to hold the NEPA meeting before the District 4 meeting. Given the number of meetings involved in the master planning process, it is not possible to avoid all conflicts, however the current schedule did allow for the avoidance of the most significant ones. There was an open public comment period following the NEPA public meeting, and materials presented at the meeting were available on the project website for those who were unable to attend.

### **Green Space & Pedestrian Circulation Comments**

Approximately 9% of the comments related to green space and pedestrian circulation. These comments are summarized below:

- Green space areas should be designated for specific functions, for example one for veterans, one for visiting families, one for locals / neighbors not specifically linked to using the hospital, one for smokers, etc.
- Green space should be open to the public.
- There should be easy access between rehab and the inpatient areas to both open and covered green space.
- Worried about a dead zone along the Canal Street side, this impact will be felt during the Endymion parade and other big events. It should be a pedestrian friendly area. Thought there were plans for retail space on ground floor. Worried about long empty stretch during nights and weekends, possible crime and urban blight issues may develop.
- The concourse concept combined with green space is fabulous.
- The concourse should be atrium like, it is important to take into account the experience of the hallway.
- Concerned about the oak trees along Banks Street. Some of the designs only have preserved the oaks on one side not on the other. There is also a gorgeous huge palm tree in the median almost at the foot of Banks and Galvez that should be saved. Concerned about the trees and losing the canopy which provides habitat and protection from high winds.
- Super blocks don't allow for pedestrian activity.
- Veterans and their families will have too far to travel to get to the inpatient, outpatient, and diagnostic areas. Especially difficult for the handicapped.
- A possible covered walkway between buildings at elevated levels would facilitate movement for staffers as well as clients.

#### RESPONSE:

**Green Space & Security:** The purpose of the VAMC campus is to serve the medical needs of area veterans. While there will be no perimeter fence restricting access to the VAMC campus, due to federal security requirements, the campus is not intended for regular use by the general public. Courtyards across the campus will be available for patient, visitor, and staff use, currently there are no plans for designating certain courtyards for certain purposes, though due to locations some natural delineations may occur. Currently the VA is planning to operate as a smoke-free campus, but should that decision change, appropriate smoking areas will be designated. Courtyards will be readily accessible by all patients, including those in the rehabilitation and transitional living facility. Federal security requirements prevent the use of any parts of the campus for retail space or designated public use areas. The Canal Street side of campus will be appropriately lit and aesthetically appealing as detailed in Section 3.2 of the SEA, thereby providing for a comfortable pedestrian experience. The parade experience will not be altered due to the wide setbacks of the buildings and the decision not to include a fence.

The street and sidewalk widths will not be altered along Canal Street . VA security would be readily available to address potential safety issues if necessary. In addition to around the clock security at the VAMC, the development of the UMC adjacent is likely to prevent long periods of time when the area is not in use, as this facility will be operational at all times.

**Oak Trees:** VA recognizes the importance and the appeal of the live oak trees within the project site. The design team has made every effort to preserve, maintain, and even enhance the live oak canopy along Banks Street. During construction of the replacement VAMC, VA will work with the City to fill existing gaps in the oak canopy along Canal and South Rocheblave Streets to enhance the integrity of the oak corridor. Efforts have been made in most of the Alternatives to preserve as many oak trees as possible while still achieving the programmatic needs.

**Pedestrian Circulation:** Patient and visitor drop-off would be possible at the front entrance, minimizing the walking distance for all patient areas. Assistance would be available as necessary for patient transport around campus. Visitor and patient circulation around campus would be facilitated by the use of the enclosed concourse connecting patient areas at the first, second, and third floors. Patient transport would also occur along the restricted fourth floor level of the concourse. The areas of the concourse not immediately adjacent to buildings would be glass enhancing the aesthetic experience.

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### **VAMC/UMC Connection**

Approximately 6% of the comments related to the connection between the proposed UMC and the replacement VAMC. These comments are summarized below:

- It would be helpful to see the UMC plans/designs in conjunction with the VA schemes. It is impossible to understand the full impacts without looking at the combined projects at the same time.
- We were told throughout all the earlier processes that the connection with LSU was a central part of the site selection, yet in the current designs there is no connection at all with the UMC. That was the basis for site selection – where is the connection.
- Any relationship between these two facilities seems to have been abandoned. There are no shared facilities, no economy of scale, and no synergy.
- Previous comments have stressed the need to evaluate the impacts of these facilities together, yet the process has become even more segmented than before.
- The massing of both sets of buildings will have a huge impact on Canal Street that needs to be considered.

RESPONSE:

**Cumulative Impacts:** VA acknowledges the need to evaluate the cumulative impacts of the two medical facilities. The cumulative impacts section of the PEA for site selection and the cumulative impacts section of this site-specific EA both consider the impacts of the combined VAMC and UMC facilities on the surrounding area.

During the Tier I site selection process, VA worked in partnership with FEMA, the State of Louisiana, and the City of New Orleans on development of the PEA. However, during the Tier II process, the site-specific environmental assessments require detailed evaluation of the construction and operations of each medical facility. The respective facilities have different rolls to play in the medical community which result in distinct programmatic and operational details that influence the design and therefore the impacts of the facility. The two agencies have been sharing information regarding design plans and the cumulative impact analysis provided in each SEA will be based on all information available at the time of document publication. Cumulative impacts are addressed in Section 4.0 of this SEA.

**Synergy:** VA continues to work with the State of Louisiana to identify opportunities for shared services between the VAMC and UMC. The proximity of the VAMC to its academic affiliates, including the UMC, LSU, Tulane, Delgado, and Xavier, fosters operational synergies and ease of access for residents, fellows, and specialty care providers in order to facilitate excellent patient care.

VA and the State of Louisiana are continuing to evaluate the possibility of sharing a combined central energy plant (CEP). There are a great number of individual issues to be evaluated to determine the feasibility of this opportunity. Such issues include timing of construction, sizing of equipment, ownership, construction funding, operational funding, maintenance and operational needs, and other issues. Should the determination be made that VA and UMC would share a central energy plant on the UMC campus, it will not substantially alter the building massing of the CEP on the VA campus, though it may result in minor changes in either the number of floors or a small reduction in footprint. The VA must maintain some independent services due to security and service requirements. The VAMC must maintain 7 days emergency self-sufficiencies for utility and support services including electricity, heating and air conditioning (HVAC), communications, etc. Additionally, the VAMC requires space for distribution, waste processing, and other service functions. Therefore, for all alternatives, the positioning, footprint, and general massing for the VAMC CEP will only be subject to minor alternations should a future agreement be reached with UMC regarding a shared CEP.

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**Banks Street, Traffic/Transportation, & Parking Comments**

Approximately 6% of the comments related to Banks Street with concerns about traffic congestion and preservation of the oak trees. These comments are summarized below:

- Banks Street is a vital lifeline, concerned about blocking off traffic there - traffic on Tulane and Canal will suffer as a result creating congestion. Question the reality of VA regulations for not leaving Banks Street open.
- Tulane Avenue cannot handle the volume of traffic Banks Street carries and there is no way to expand or increase capacity of Tulane Avenue.
- If both complexes were studied together, what would be the level of traffic expected for streets such as Galvez and Rocheblave?
- There are an additional 1,500 apartments getting ready for occupancy on Tulane Avenue. The traffic from people who reside in those apartments, combined with increased pressure caused by the VA hospital designs diverting traffic from Banks Street, will cause serious traffic congestion on Tulane Avenue and Canal Street and throughout Mid City, downtown New Orleans and other areas of the city. What traffic studies have been done to analyze these impacts?
- Traffic to access staff parking would be shunted to South Rocheblave Street which has a very low capacity for traffic. This traffic will adversely impact the adjacent historic district in addition to causing congestion.
- What are the alternatives for closing off Banks Street?
- Is there any creative way to break up the super blocks? Couldn't the existing streets be incorporated with bridges to connect?
- There is no indication that the plans attempt to recognize the needs of individuals arriving by public transportation, whether patients, staff, or visitors.

RESPONSE:

**Traffic Study & Impacts:** A traffic impact study was conducted to evaluate the impacts of the VAMC and cumulative impacts of the adjacent UMC on traffic. The traffic study included an analysis of the impacts of closing Banks Street and all internal streets on the VAMC as well as the impacts of using South Rocheblave and Galvez as major access points for the medical center. The results of the traffic study and impacts analysis are presented in Section 3.7.

**Alternatives to Closing Internal Roads:** Because of federal security requirements, facility needs, and the design configuration, it is not possible to leave any of the internal roads open on the VAMC campus. Bridges to connect the roads on opposite sides of the VAMC campus would not be possible because of federal security requirements; additionally they would be unnecessary as traffic can be routed along other neighboring streets.

**Public Transportation:** The replacement VAMC will be very accessible to public transportation. The streetcar route runs along Canal Street on the northeast side of the campus and stops within a short walk of the main entrance. Bus routes traverse Canal and South Galvez Streets and Tulane Avenue with bus stops within a short walk of the main entrance.

### **NEPA/NHPA Compliance Process**

Approximately 4% of the comments related to the environmental and historic preservation compliance process. These comments are summarized below:

- The MOU signed between VA and LSU predated the environmental and historic preservation compliance process which is possible an ethical and legal violation.
- VA has conspired with LSU in the creation of this large biomedical corridor.
- There has never been an open forum about the placement of Charity Hospital or the VA.
- We did not realize that the government (VA) can just take over properties without a vote from the people.
- Tiered approach does not allow you to look at the projects as a whole and the combined effects. It does not allow transparency and the free flow of information.
- Separation of the two projects does not allow full understanding or analysis of the combined impacts.
- The process has been deeply flawed since inception.

#### **RESPONSE:**

The NEPA process is an evaluation and disclosure process that solicits input to ensure that prior to the execution of the action all the potential impacts have been thoroughly evaluated. The NEPA process does not prevent or prohibit Federal Agencies from pursuing and planning future actions or agreements. Design and construction of a new medical complex requires extensive planning and coordination. It is not unusual for agreements to be negotiated or put into place prior to or consecutive with the NEPA process. These agreements are often necessary to determine if land is available, establish purchase price, establish project boundaries, and define roles and responsibilities for the development of information that is often required during the NEPA process. These agreements are designed to capture terms and conditions and other potential contract language in the event the project is authorized. They are not a guarantee that the project will be constructed or has met all regulatory requirements.

Through the NEPA process the public has been provided numerous opportunities to openly discuss the location of the new VAMC. The public meetings (26 June 2008 (afternoon and evening meetings), 11 August 2008, 17 July 2008, and 28 October 2008) associated with the PEA were specifically designed to allow public comments on the location of the new hospital. The more recent public meetings as well as the SEA were designed to address the impacts associated with the specific design features of the new VAMC. In addition, input was also received from a number of elected local officials and numerous local, state, and Federal agencies, representing various public view points. The site selection process was completed after issuance of the FONSI for site selection.

The NEPA process allows for project tiering. Project tiering is frequently necessary to allow a thorough evaluation of project impacts. For example, for the VAMC, facility design could not proceed until site selection was made. Following this critical milestone, VA could evaluate impacts associated with areas such as traffic, noise, aesthetics, floodplain, etc. Using a tiered approach, the public has the opportunity to review and comment on the impacts of the project based on the actual facility design. Likewise, the tiering process allows for a detailed evaluation of cumulative impacts once the impacts of the actual design are evaluated.

During the Tier I site selection process, VA worked in partnership with FEMA, the State of Louisiana, and the City of New Orleans on development of the PEA. During the Tier II process, the site-specific environmental assessments require detailed evaluation of the construction and operations of each medical facility. The respective facilities have different rolls to play in the medical community which result in distinct programmatic and operational details that influence the design and therefore the impacts of the facility. VA and FEMA have been sharing information regarding design plans and the cumulative impact analysis provided in the each SEA will be based on all information available at the time of each document's publication. Cumulative impacts are addressed in Section 4.0 of this SEA.

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### **Elevation/Drainage Comments**

Approximately 3% of the comments related to elevation and drainage issues. These comments are summarized below:

- What will keep the surrounding neighborhoods from flooding more than they already do if they hospitals are both raised several feet above the existing grade?
- What will be the elevation of the first floor in each alternative?
- Raising the first floors to 20-25 feet above the current ground level will dwarf the surrounding neighborhood.

#### **RESPONSE:**

A number of innovative measures would be incorporated into the replacement VAMC design to effectively develop the site without increasing the storm water runoff flow rate. Such measures would include, but would not be limited to: minimizing impervious areas through landscaping and use of green roofs, retention of storm water in storage tanks for re-use, and providing areas within the site that allow high infiltration rates of storm water such as bio-swales and infiltration planters. These measures are discussed in detail in Section 3.3 Floodplain Management.

Post Katrina, FEMA established the Base Flood Elevation (BFE =100 year flood plain) for all areas of New Orleans. For the VA site, the BFE has been established at zero (0) ft above msl. The City of New Orleans and surrounding jurisdictions have established an

Advisory Base Flood Elevation (ABFE) for all areas of New Orleans. The ABFE is the higher of the BFE or 3 ft above the Highest Existing Adjacent Grade (HEAG) around the perimeter of a parcel or property (highest curb elevation). The HEAG on the VA site is located at the corner of Canal Street and Miro Street and is -1.67 ft below msl. This would establish three (3) ft above the site's HEAG as +1.33 ft above msl. In this respect, +1.33 ft, being greater than the BFE (0 ft), establishes the ABFE for the VA site. VA has confirmed 1.33 ft above msl as the acceptable Finished Floor Elevation (FFE) for the medical center. The first floors of the new buildings on the replacement VAMC campus would all begin at this elevation.

All Mission Critical facilities in the medical center have been located on the second level, which is 19 ft above the first level, at approximately 20.33 ft above msl. According to the USACE models for storm surge impact, once improvements to the New Orleans levee system have been completed in 2011, the mission critical second level will be well above the 500 year floodplain.

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### **Historic Buildings Comments**

Approximately 2% of the comments related to historical buildings. These comments are summarized below:

- What is the status of the feasibility study for the retention and reuse of Dixie Brewery. We have heard there have been issues with gaining access to the building.
- Proponent for the retention of Pan-Am and Dixie Brewery. Keep the tower of Dixie Brewery.
- There is nothing redeemable in the Pan-Am Building, it is an architectural disaster.
- Please consider saving and rescuing more of the residential structures and lining the full length of Rocheblave with them. Relating the project to the neighborhood is most important.
- The incorporation of houses along Rocheblave is a good idea. They could be used for psychiatric patients who are in transition to independent living.

RESPONSE:

**Pan-Am Building and Dixie Brewery:** As agreed in the PA, VA intends to retain and incorporate, if possible, both the Pan-Am building and the Dixie Brewery. VA will incorporate the Pan-Am building into the replacement VAMC as an administrative center. VA is still awaiting the opportunity to gain access to the Dixie Brewery to conduct the feasibility study for retention and reuse of the facility. VA anticipates that the study will conclude that parts of the building, including the iconic façade along Tulane Avenue and South Tonti Street and the copula will be able to be retained and

incorporated into the replacement medical center. These aspects of the Dixie Brewery would be combined with new construction to house research facilities. When the feasibility study has been completed it will be shared with the consulting parties through the dedicated website as agreed in the PA. The options for retaining both the Dixie Brewery and the Pan-Am building are discussed in Section 3.9.3.

**Residential Structures:** The final number of residential structures to be incorporated into the replacement VAMC will be determined by facility needs and project budget. Currently, the design includes the incorporation of four residential structures. These structures are intended to be used as part of the rehabilitation and transitional living and other programs.

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## **APPENDIX B**

### **Consultation Correspondence**

BOBBY JINDAL  
GOVERNOR



SCOTT A. ANGELLE  
SECRETARY

State of Louisiana  
DEPARTMENT OF NATURAL RESOURCES  
OFFICE OF COASTAL RESTORATION AND MANAGEMENT

September 1, 2009

Carol Freeman  
AECOM  
1555 Poydras St., Suite 1860  
New Orleans, LA 70112

RE: **C20090410**, Coastal Zone Consistency  
**U. S. Department of Veterans Affairs**  
Direct Federal Action  
Replacement of the Veterans Affairs Medical Center, New Orleans  
**Orleans Parish, Louisiana**

Dear Ms. Freeman.

The above referenced project has been reviewed for consistency with the approved Louisiana Coastal Resource Program (LCRP) as required by Section 307 of the Coastal Zone Management Act of 1972, as amended. The project, as proposed in the application, is consistent with the LCRP. If you have any questions concerning this determination please contact Brian Marcks of the Consistency Section at (225)342-7939 or 1-800-267-4019.

Sincerely yours,

Gregory J. DuCote  
Administrator  
Interagency Affairs/Field Services Division

GJD/JDH/bgm

cc: David Butler, LDWF  
Wynecta Fisher, Orleans Parish  
Tim Killeen, CMD FC  
Pete Serio, COE-NOD