

APPENDIX A

A-1

**Public Comments
Environmental Scoping for the Replacement VAMC Design Alternatives**

A-2

**Public Comments received during the 30-day Public Comment Period
on the Draft SEA for the VAMC**

Appendix A-1

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.

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 loose 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.

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.

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).

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.

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.

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.

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.

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.

Appendix A-2

Comments received during the 30-day Public Comment Period on the Draft SEA for the VAMC

Introduction

The official 30-day public comment period began on 13 January 2010 when the Draft SEA was made available to the public through the project website and by request. A public meeting was held on 19 January 2010 at Grace Episcopal Church in New Orleans to present a summary of the SEA analysis and to allow the public ask questions for clarification and provide comment. Additionally, the public had the opportunity to submit comments or questions via email, mail, or in person during the 30-day period ending 12 February 2010. All comments were reviewed and those pertinent to the SEA are summarized below. Every attempt has been made to adequately respond to these comments and incorporate them into the final SEA. Public involvement in development of this SEA is discussed in Section 1.3.

For the purposes of clarity, the comment and response summary is presented in the same order the topics occur in the document. Similar comments are grouped together and/or summarized with one response following. Table A-2.1 presents the comment categories in order from the highest number of comments to the lowest based on the percent out of the total.

Table A-2.1 Public Comments on the VAMC Draft SEA Organized by Total Percentage

| Category | Percent |
|---|----------------|
| PEA/Site Selection/City Planning/Hearings | 17.6 |
| Cumulative Impacts | 13 |
| <i>General</i> | 3.5 |
| <i>Drainage</i> | 3.2 |
| <i>Waste/Air/Noise/Cultural Resources</i> | 2.6 |
| <i>Transportation</i> | 2.1 |
| <i>Aesthetics</i> | 1.5 |
| Aesthetics | 8.5 |
| Transportation/Traffic/Parking | 7.9 |
| Cultural Resources | 7.8 |
| Support for Hospital | 7.0 |
| EIS/Tiering | 5.9 |
| Floodplain (Drainage/Fill) | 5.6 |
| Miscellaneous | 4.7 |
| Infrastructure | 4.7 |
| Waste | 3.8 |
| Air Quality | 2.9 |
| LSU Connection Comments | 2.3 |
| Noise | 1.8 |
| CEA/MOU | 1.2 |
| No Action Alternative | 0.6 |

No Action Alternative

Approximately 0.6 % of comments address the reason behind evaluating the No Action Alternative in the SEA.

COMMENT SUMMARY

The No Action alternative was addressed in the PEA and was ruled out. VA has declared they are committed to building a hospital in New Orleans. Presentation of a No Action alternative was viewed as misleading and meaningless in light of VA's dedication to rebuild in New Orleans. There was some concern about how VA could be actively acquiring property while also still considering a No Action alternative in which no hospital would be constructed. Implications of choosing a No Action alternative after initiating property acquisition could result in up to 30 acres of vacant land.

RESPONSE

VA remains committed to building a replacement VAMC in New Orleans. The no action alternative was examined in the PEA, and the examination continues in the SEA with respect to information related to construction and operations of the medical center. The no action alternative as presented in this SEA represents the option to not build the replacement VAMC on the Tulane/Gravier site. Though this is a remote possibility, it is a reasonable alternative and must be evaluated as part of the NEPA process. All potential impacts regarding selection of this alternative have been examined in the SEA, including the potential impacts related to acquisition of properties and potential disposition of said properties should this alternative be selected (Section 2.1).

Aesthetics

Approximately 8.5 % of the comments address Aesthetics.

COMMENT

The Draft SEA states that some of the buildings within the VA site have not been repaired since Hurricane Katrina, which "leads to a disjointed and disruptive experience of both residential and commercial aspects of the area." Furthermore, the Draft SEA presumes that should the No Action alternative be selected property owners "would eventually seek building permits to repair structures..." However, the city imposed a moratorium that has prevented rebuilding for several years. This has created a self-fulfilling prophecy and has forced the area to retain the appearance of blight. Therefore, the city must take responsibility as one of the causes for blight in this area.

RESPONSE

The purposes of the SEA are to describe the existing conditions of the project site and surrounding area and to analyze the potential environmental impacts on the area with respect to various resources based on completion of any of the project alternatives. For

aesthetics, the current existing conditions include a large proportion of damaged buildings. The moratorium did not halt or stop the issuance of building permits in the project area. It delineated a process by which property owners could obtain such the requisite permits if they were renovating their property by a large percentage. In the event that the no action alternative is chosen, it would be expected that the moratorium would be allowed to expire without renewal thus allowing for rebuilding and possible redevelopment in the project area.

COMMENT

Figure 2-9 in the Draft SEA shows a refined scaled design depicting how the buildings would appear with respect to each other and their surroundings. We would like to see a similar depiction showing the view from the existing elevation of homes on South Rocheblave Street to show the scale and visual impact from the homeowner's perspective.

RESPONSE

To address this concern, Figure 3-7 has been expanded to include a view of the adjacent neighborhood.

COMMENTS

This is suburban model of design and does not fit the surrounding urban area.

- Question how this design “authentically reflects the culture of the area and respects the neighborhood” (Draft SEA page 1-5). In no way do the materials, or the design, reflect New Orleans - even if phrases such as “to integrate into the unique cultural and historical environment of New Orleans” (Draft SEA page 3-26) are used.
- The Draft SEA does not support the conclusion that “the use of materials and design to shape the appearance of the various buildings proposed for the replacement VAMC would minimize their potential impacts on the visual aesthetic character of the project area” (Draft SEA page 3-31).
- The massing and aesthetics of the VAMC are drastically out of scale with the Mid-City neighborhood. The visual impact from homes looking to the new facility is jarring. Even the residential structures for rehabilitation and transitional living are dwarfed (Figure 3-8 in the Draft SEA).
- In the existing conditions section, the SEA states that the site has “a somewhat industrial aspect, which dwarfs the smaller residential buildings . . . further confusing the experience of the neighborhood.” Those smaller residential buildings would be “dwarfed” all the more by the construction of the proposed VAMC.
- The SEA does not support conclusion that the massing and design of the VAMC hospital would “minimize its visual impact on the surrounding neighborhood” (Draft SEA page 3-20).
- Figure 3-8 (Draft SEA page 3-26) shows a conceptual design for the rehabilitation and transitional living building that appears strikingly incompatible with the historic homes proposed for relocation along South Rocheblave Street and doesn't

even attempt to show a relationship between the new building and the historic buildings across the street.

RESPONSE

VA has endeavored to integrate comments from the general public, business owners, and interested stakeholders as well as veterans, medical staff, and other advisors regarding the design and materials of the replacement VAMC. The VAMC has incorporated cultural elements such as New Orleans style courtyards, southern Louisiana native vegetation, external louvers on windows reminiscent of shutters common throughout the city, external aesthetic features reflecting the design of the Pan-Am building and Dixie Brewery, and use of external building materials consistent with commercial properties in the surrounding area. Public and agency comments have been incorporated into the design and materials have been selected that would reflect the existing architecture in the area. Currently, buildings with an industrial appearance are found interspersed with smaller structures along Canal Street and Tulane Avenue. These buildings are much larger than some of the adjacent buildings and many of the existing structures in the center of the VAMC project site, thus making the smaller residential buildings appear even smaller or 'dwarfed'. The VA has set all of the larger medical buildings back from the street in order to create a smoother transition from the surrounding residential and commercial areas to the campus. The rehabilitation and transitional building has been designed to step up from the smaller relocated homes to the larger medical buildings in the center of the campus. It has also been placed appropriately for ease of access amongst the three types of buildings (relocated homes, rehabilitation facility and parking structures) which would be accessed by the patients and staff engaged in rehabilitation. The scale and massing of the VAMC has been evaluated in terms of patient care as well as potential impacts on the surrounding area. It is a medium sized building in between smaller and larger buildings, creating the perception of a gradual increase in size from South Rocheblave Street to the center of the campus. Additionally VA has planned to enhance the existing live oak canopy along the perimeter streets and within the project interior, thus recognizing the importance of such oak canopies as part of the character of the city and the surrounding neighborhood. To soften the transition to the adjacent neighborhood, VA has also planned an increased setback with an extensive landscaped buffer along South Rocheblave Street. The homes across South Rocheblave Street would therefore not be dwarfed, but would be adjacent to similarly sized structures and landscaped areas.

VA has implemented all of these design considerations with the intent to minimize aesthetic impacts to the area and it is VA's belief that these elements would be successful. With implementation of these design features, VA believes the proposed action authentically reflects and integrates with the unique culture of the area, respects the neighborhood, and minimizes potential adverse aesthetics impacts on the surrounding area.

Aesthetics are often a function of opinion, and invariably, there will be disagreements amongst people regarding whether or not something is pleasant or not. VA has incorporated as many opinions and discussions as possible, in order to accommodate a diverse range of input and achieve a balance of pleasing architecture and high-functioning healthcare facilities.

COMMENT

The suggestion that original wood flooring would be salvaged from homes and other buildings as they are demolished (SEA at 3-27) creates false hopes. The Preservation Resource Center has already been advised by the demolition contractor that flooring would not be salvaged.

RESPONSE

While VA would consider salvaging original wood flooring from structures currently present on site, and integrating the flooring as an artistic feature of the central concourse interior design, there are a number of feasibility issues (financial, schedule, and liability considerations and analysis of the availability of flooring in acceptable condition) that must be considered and coordinated with the City and State before a final decision can be made. The recovery of such flooring would be a separate process from the architectural salvage program and would not involve the PRC or other agency conducting salvage under the stipulations of the PA.

COMMENT

Figure 3-6 (Draft SEA) illustrates the incompatible design of the CEP/Warehouse building. The massive, windowless bulk of this building, combined with the odd angularity of the facades on South Galvez Street and Tulane Avenue, are incompatible with the character of the surrounding area.

RESPONSE

The shape of the CEP building was altered in response to public comments regarding the live oak trees lining Banks Street. In order to retain the trees and to maintain the required 50-foot setback requirement for security, the footprint of the building had to be made smaller. Due to this change in size, the building was no longer large enough to accommodate the square footage required for the mechanical equipment and warehousing duties. Thus, the upper floors had to be made larger than the lower floors, resulting in slightly angled walls. This angle was chosen as it reflects the non-right angles of the intersection of Tulane Avenue and South Galvez Street, providing a direct visual link to the existing street grid. The existing character of the surrounding area is varied, with the blood center, a concrete industrial type building across the street and the LSU HSC and Louisiana Cancer Research Consortium located nearby. In the future, this building will sit across South Galvez Street from the UMC, which will place it in a more modern setting, blending effectively with these surroundings. There are windows in the façade of the building, as is visible in figure 3-16, the night view of the CEP from South Galvez Street. The small number of windows reflects security requirements, as well as aesthetic considerations, windows looking on into equipment banks or storage or maintenance rooms would have less aesthetics appeal than the carefully designed building façade.

COMMENTS

- Massing impacts are understated and misleading because they fail to consider the impact of the large new buildings being elevated by up to 5.86 feet of fill in comparison to surrounding adjacent properties such as the single-story homes along South Rocheblave Street.

- Concern about the transition to the adjacent neighborhood if the site is raised to 1.33 ft above msl - as well as placing the emergency and ambulatory care entrance off the neighborhood street (South Rocheblave Street) at an elevation of 23.33 ft above msl.

RESPONSE

The entire site is not being raised to 1.33 ft above msl as discussed in the response to floodplain questions below. Due to the large setback from South Rocheblave Street, the impacts of the elevation of the buildings will be negligible. The ground will be raised slowly over a 100 foot horizontal distance, resulting in a relatively small slope. This, in combination with landscaping will render the incline nearly imperceptible (figure 3-7). Elevations immediately across the South Rocheblave from the residential neighborhood will be at or near existing grade. Therefore, VA does not believe there will be any potential adverse impacts related to aesthetics with regard to raising the site elevation for the medical center.

The emergency room entrance will be at approximately 23.33 ft above msl to place this mission critical facility above the 500-year floodplain as required by federal regulations. The VAMC is not a trauma facility, therefore, VA does not anticipate receiving high volumes of ambulance traffic (estimates based on usage rates at other VAMC's predict approximately 4 per week). The entrance to the emergency room is set back from the neighborhood by over 100 ft and is screened by a number of trees. VA does not anticipate that there would be adverse impacts to the adjacent neighborhood with respect to aesthetics as a result of the elevation of the emergency room entrance.

COMMENT

The preserved residential units were the only attempt at a better transition from a massive medical complex to a real neighborhood. It is extremely disappointing to see it reduced to a novelty by reducing the number of preserved structures to two to four instead of the previously mentioned eight.

RESPONSE

VA has incorporated a number of design features to transition from the medical center to the residential neighborhood, including organizing the site with an increased setback along Rocheblave Street, preservation of the trees along Banks Street, use of vegetative covering on the parking garage, and planting of additional trees to soften the view of the medical center buildings. The number of residential houses preserved and integrated into the medical center is controlled by program needs and budget considerations. The PA did not include any provision or requirement for VA to integrate any individual residential structures. VA has voluntarily elected to consider preservation and integration of integrate up to four of the residential structures.

COMMENTS

- The Draft SEA states that the massing and design of the new Research Building would “not create a significant aesthetic impact” on the Dixie Brewery (Draft SEA page 3-20). On the contrary, Figure 3-5 (Draft SEA) shows that the proposed new building would completely dominate the Dixie Brewery—only the cupola

would stand out as a hood ornament against the backdrop of a massive modern façade.

- Using a colored metal panel on the Research Building to visually integrate with the historic bricks of the Dixie Brewery creates a stark contrast of elements - not an integration.

RESPONSE

The façade and tower of Dixie Brewery would anchor and serve as the main focal point of the research building as is evident in Figures 3-5 and 3-6. The research building is almost entirely hidden from view when traveling along Tulane Avenue from the CBD. The colored metal panel is located on the first floor of the research facility is a relatively minor part of the building overall. The color was chosen to reflect the red brick of the Dixie Brewery and to transition to the more modern glass and metal façade of the new construction. This paneling will only be seen in small parts, due to the landscaping in front of it. These trees will break up the metallic effect, merely showing hints of brick color in between the foliage. This portion of the existing building is currently white wood frame (photos 3-13 and 3-15). This wood framed structural component is immediately adjacent to brick structures on both sides (photo 3-16), which also presents a contrast of elements. VA believes the metal panel will blend effectively with the brick façade of Dixie Brewery and will not present adverse aesthetic impacts.

COMMENT

Questions about beautifying the North Galvez neutral ground in a manner similar to what was done for Tulane Avenue when the new apartment complexes came in. It would uplift the neighborhood that would be affected by the sight of the new buildings.

RESPONSE

VA would welcome efforts to revitalize and beautify North Galvez Street which would be a direct route to the medical center from locations northeast of the campus. VA, the State, and City, are engaged in similar discussions regarding the segment of South Galvez Street that passes between the two medical centers. Any changes to North Galvez Street fall within the purview of the City, however, as it is outside of the VAMC campus. VA encourages such comments and suggestions be shared with the appropriate City organizations.

COMMENTS

- The proposed energy plant for the VA site would have a disproportionately harmful impact on the live oaks along Banks Street. The CEP/Warehouse building would destroy and displace live oak trees along Banks Street, rather than protecting them.
- Oak trees that are not displaced by the CEP/Warehouse building would be threatened by dumping up to 5.86 feet of fill dirt on the site.

RESPONSE

VA has made extensive effort to avoid and minimize potential adverse impacts on existing live oak trees, including constraining, and refining the footprint of the

CEP/Warehouse building to allow for the retention and protection of all live oaks currently present along Banks Street. VA intends to create a courtyard on the replacement VAMC campus with this live oak corridor as a landmark aesthetic feature. During construction, BMPs would be employed to avoid potential damage to the live oaks. No fill dirt will be used in the areas where live oak trees are present, these areas would remain at existing grades. VA believes that these measures will minimize and mitigate potential adverse impacts to the live oak trees currently present along Banks Street.

COMMENT

Comments on energy efficiency and sustainability focused on the failure of the Draft SEA to include a discussion regarding the adverse impacts of demolishing the existing structures and roadways on the site and adding that estimated 46,000 tons of debris to a landfill. An accurate, meaningful assessment of sustainability and energy efficiency must consider the project as a whole, rather than compartmentalizing the harmful and the beneficial impacts and considering them separately.

RESPONSE

The potential adverse environmental impacts related to demolition were addressed in the PEA as part of the site selection and preparation process in Tier I and are discussed in section 3.8.2.2 of the PEA. The energy efficiency and sustainability discussion in the SEA focuses on the Tier II process related to construction and operations of the replacement VAMC.

COMMENT

The comments received regarding lighting stressed that the illuminating elements of the lights should not be visible from adjacent housing.

RESPONSE

The type, placement, and orientation of lighting fixtures have been designed to minimize adverse impacts of the VAMC campus on the surrounding area, including the adjacent housing. These measures are discussed in the *Lighting and Glare* subsection of Section 3.2.2.2.

Floodplain (Drainage/Fill)

Approximately 5.6% of comments focused on floodplain and drainage issues including concerns about the use of fill to elevate the VAMC above the 100 year floodplain. These comments are summarized below.

COMMENT

Although drainage may be designed to handle the capacity of projected runoff, ensuring that runoff does not flood the surrounding neighborhood is not feasible. When will we see drainage studies that include all of the affected areas?

RESPONSE

The drainage study has been included in Appendix C. This study expands on how the estimated 25% average runoff reduction was calculated and shows topographic maps for site elevations pre- and post- development.

COMMENT

Impervious area calculations for the existing conditions on the VAMC site are inaccurate because they use rooftops to designate impervious surfaces and do not taken into account the fact that the homes are raised and runoff is therefore accommodated underneath the structures.

RESPONSE

Although there is technically a pervious surface underneath a raised home, this is not an area that accommodates run off. Gutters are generally placed on a home such that rain is directed towards the city maintained street drainage system. This would mean that most rain falling on the roof's surface would end up in the street gutter, not underneath the house. Although some of the rain falling in the area would dampen the earth under the house, any drainage structures directing runoff to the underneath of a home would eventually undermine the foundations of the structure, by alternately wetting and drying the ground and by facilitating erosion. This process equates to expansion and shrinkage on a regular basis in addition to removal of the underlying soils, which would eventually shift the foundation of the home. Therefore, although the ground underneath a raised home is technically able to accommodate runoff, this is generally not considered as a pervious surface.

COMMENT

Runoff from the site will be more than 25%.

RESPONSE

VA agrees that runoff from the site will be more than 25%. VA anticipates *reducing* the amount of runoff from the site *by* 25% on average in comparison to the existing conditions. The amount of runoff from the site will vary depending on a number of factors including the level of saturation of the ground when a storm event occurs, the severity of the storm, the amount of water already in rainfall collection tanks at the VAMC, and the amount of water already in the New Orleans stormwater drainage system. The average anticipated reduction in runoff from the site after completion of the replacement VAMC is 25% and the calculations showing how this rate was determined have been included in Appendix C.

COMMENTS

- Current elevations on the VA site actually range from -1.67 ft below msl to -4.53 ft below msl. As a result, the lowest portions of the site will actually need 5.86 feet of fill—almost double the amount previously discussed—in order to achieve the desired elevation of +1.33 ft above msl. However, the Draft SEA fails to disclose any specific information such as an elevation map, showing how much of the site, and which portions, are at or close to -4.53 below msl. Will the majority

of the site be elevated with almost six feet of fill or will the new buildings be islands elevated above the surrounding permeable areas? The Draft SEA references a topographic survey by BFM Corporation LLC (page 7-1), but the actual survey has not been made available. Much more detailed information is needed, including mapping and visual simulations, in order to understand the visual and drainage impacts of this new information.

- What will be the effect on the historic homes across South Rocheblave Street (both visually and in terms of drainage) when the two to four token homes used for transitional living (as well as the staff parking garage and the rehabilitation and transitional living facility) are perched on an escarpment that rises up to 5.86 feet above the adjacent historic district? Such an escarpment could act as a barrier that may dramatically alter current drainage patterns and trap stormwater runoff in the surrounding neighborhood.

RESPONSE

The entire site will not be raised with 5.86 ft of fill. The buildings will be raised so that the base elevation of the first floor is 1.33 ft above msl, in order to comply with FEMA and City of New Orleans regulations regarding floodplain management. The amount of fill required to reach this elevation will vary across the building footprints across the site. The area surrounding the buildings will gradually slope up to the 1.33 ft above msl elevation. Much of the perimeter of the site, including the area along South Rocheblave Street will remain at or near existing grade, and/or have infiltration planters to control runoff. A topographic map of the existing site conditions was developed from the BFM Corporation survey. Because the survey was restricted to public areas, the topography across private property is extrapolated. A complete topographic survey of the site will be conducted after the site is cleared. A topographic map has been developed during the design process to show the projected elevations of the replacement VAMC campus post-construction. Both maps are included in Appendix C.

COMMENT

Where is the fill located and how would it be transported to the site? How many dump trucks would be required to transport the fill and what routes would they take? Would they generate vibration impacts as convoys of loaded dump trucks pass along blocks lined with fragile shotgun houses? Has the fill been tested for potential archaeological resources? For potential contamination? None of this has even been mentioned, much less analyzed and evaluated.

RESPONSE

The VA Master Construction Specification (PG-18-1) Division 31 20 00 Earth Moving guideline specifies standards regarding the use of fill materials. This standard provides guidance on the composition and condition of the material, and the required tests that must be conducted before it can be selected for use. VA contractors would follow and apply all applicable federal guidelines including requisite archaeological, contamination, and soil strength testing before choosing a fill to be used on the replacement VAMC site.

The number of trucks required to transport this fill to the site cannot yet be determined as the total amount of fill required cannot yet be precisely calculated. The total amount of

fill required to raise the BFE of the medical center to 1.33 ft above msl will be calculated after the property is acquired and VA can conduct a topographic survey over the entire site. Transportation routes would be via the major roadways, I-10, Tulane Avenue, Canal Street, and South Galvez Street. There should be no anticipated movement of construction vehicles down neighborhood streets. Trucks carrying fill dirt should produce vibration impacts similar to those created by waste collection services, so even if such vehicles do transit South Rocheblave Street, the vibration impacts on the nearby residences would be minimal.

COMMENT

The “Floodplain Management” impacts (Draft SEA page 2-26) are grossly mischaracterized by asserting that the project would have “moderate beneficial impacts to drainage in the area.” This summary is not only contradicted by the later statement that the new medical center “will *not* correct existing drainage issues in the surrounding area (emphasis added),” (Draft SEA at 3-45 and 4-16), but fails to account for the elevation of the site by up to 5.86 feet fill, and the impacts of that differential elevation on drainage and flooding in the surrounding historic neighborhood.

RESPONSE

VA strongly believes that the drainage plans for the replacement VAMC will have moderate beneficial impacts to drainage in the area. The drainage plan for the medical center will significantly reduce the current amount of runoff from the site by implementing the measures described in Section 3.3.2.2 of the SEA (i.e. a new drainage network sized to handle up to a 10-year storm event, infiltration planters, retention of stormwater for reuse, etc.). The VA can only make modifications to the replacement VAMC campus, VA is not responsible for the drainage network of the surrounding area beyond the campus. The amount of runoff from the VAMC campus will be reduced from current levels, therefore impacts to drainage on the site and for the perimeter streets immediately adjacent to the site should be moderately beneficial. The City has elected to make some improvements in the stormwater system immediately surrounding the site which should further improve runoff in the immediate area. Improvements to the VAMC site however will not correct existing drainage issues in the surrounding area that are beyond VA’s control.

Waste

Approximately 3.8% of comments related to waste. Concerns included impacts to the surrounding area from waste transport, issues of contamination already present on the site, and desire for a more detailed analysis of impacts related to the greater amount of waste generated. These comments are summarized below.

COMMENTS

- This is an area that is residential now with some businesses and will become a hospital, there is the potential for significant waste issues. There are comparisons regarding hazardous waste in relation to the existing facility. Where are the

studies evaluating the impacts of placing a hospital on a site which is surrounded by residential neighborhoods?

- What kind of vehicles would carry the drums, and what routes would they travel?
- Where will waste be picked up, where will it travel, and where will it be disposed of? How frequently would these hazardous waste drums be transported off-site? Would they be traveling along neighborhood streets? Would the homes across S. Rocheblave Street be at risk?

RESPONSE

Section 3.4 has been expanded to include a discussion of the waste streams and producers currently present on the site and the details regarding future waste transport associated with operations of the replacement VAMC. Contractors have not yet been selected to handle, transport and disposal of the hazardous and medical wastes generated by the replacement VAMC. Therefore, specific information is not currently available about the types of vehicles or containers that would transport the waste, the frequency of trips, or the ultimate destination. The wastes would be handled, transported, and disposed of only by licensed contractors using appropriate equipment and procedures. Due to the placement of the CEP/Warehouse building, which would function as the delivery and disposal hub for the VAMC, the vehicles would not travel on residential streets. They would be primarily routed along Tulane and South Claiborne Avenues to I-10. Therefore, there would be minimal risk to the houses along South Rocheblave Street. Potential disposals sites are discussed in Section 3.4, though determination of the contractors and destination points will not be finalized until closer to opening of the VAMC.

COMMENT

The issues of contamination of the existing site have been inadequately addressed. What is the plan for remediation and what is the cost of that plan, in terms of impact on the surrounding neighborhood?

RESPONSE

Remediation of environmental issues on the existing site is associated with site selection and preparation and was therefore addressed in the Tier I process in section 3.8.2.2 of the PEA. Environmental site assessments to ascertain the current condition of parcels within the VAMC project site are being undertaken by the State on behalf of the City. As per the MOU between VA and the City (Appendix B), and the CEA between the City and the State of Louisiana, any remedial activities that could be necessary are the responsibility of the state and the City, and would be accomplished prior to the acceptance of the site by the VA. In accordance with local, state, and federal law, remediation would be conducted in such a way as to minimize potential impacts to the surrounding area.

COMMENT

The amount of hazardous waste for the replacement facility is five times what was generated at the old hospital. When will more information be released on this? The attempt to characterize this five-fold increase as “minor,” (Draft SEA page 3-55), is not substantiated.

RESPONSE

Sections 3.4.2.1 and 3.4.2.2 have been expanded to include a more detailed discussion of the hazardous waste produced by the existing VAMC, the existing Tulane/Gravier site and the proposed replacement VAMC. Much of this anticipated minor increase in gross generation is driven by increase in research operations capability. Internal to the VAMC campus, wastes will continue to be managed by VA's Environmental Management Services. Transportation off site will be handled by a VA contracted licensed transporter. Due to proper handling and disposition of waste materials, VA maintains that potential impacts to the surrounding area would be minimal.

Transportation/Traffic/Parking

Approximately 7.9% of comments related to transportation related concerns including roadways, automobile traffic volumes, pedestrian transportation, public transit, and parking issues. These comments are summarized below.

COMMENTS

- Please provide data on how the adjacent streets will be affected. What is the expected traffic flow and count on the smaller streets in the neighborhood? What will be the impacts due to the on the houses and streets that were not meant to carry that much traffic?
- Do not believe the conclusion that bringing this many cars and people into this neighborhood will not have a serious and damaging impact. This number of cars in this location will contribute to serious traffic jams and will have a negative impact on commuters as well as local residents.

RESPONSE

Several traffic analyses were completed by both the VA and State of Louisiana with respect to changes in traffic conditions in the area that could occur if both medical complexes were constructed. Sections 3.5 and 4.4 present discussions on the results of these analyses. As most of the streets within the two sites would be closed off, the traffic would be routed to the larger arterials, where most of the existing traffic is. Due to the size of the smaller streets surrounding the VAMC and UMC sites, it is not anticipated that drivers will chose these routes over the faster arterials. Therefore, smaller streets in the area will not experience additional traffic which would not impact the houses in these areas.

COMMENT

Apparently the impact on Tulane Avenue contradicts previous plans to reduce Tulane Avenue to a four-lane boulevard with a wider median. There is no discussion of the impact of this traffic plan on those pre-existing plans, but it would seem that the VA plan renders impossible other options to making Tulane Avenue more attractive.

RESPONSE

The RPC proposed plans to turn Tulane Avenue into a four lane road with a median and turn lane were included in the Urban Systems, Inc. traffic analysis (2010a), sections 3.5.1 and 4.4 have been changed accordingly for clarification. Although the loss of a travel lane would appear to impact traffic flow, the addition of a turn lane should increase traffic speeds in the adjacent non-turning lanes. With the proposed mitigation of the addition of a signal with a phased left turn on Tulane Avenue and South Rocheblave Streets and the adjustment of the timing of the lights at South Broad and South Galvez Streets, VA is confident that traffic along Tulane Avenue in the vicinity of the VAMC will not be negatively affected by the proposed modifications to Tulane Avenue. RPC is in the process of conducting a traffic study relevant to the potential modifications to Tulane Avenue.

COMMENT

As a business owner on South Dorgenois Street, I am opposed to making that street a one-way street.

RESPONSE

Although South Dorgenois Street is wide enough to accommodate two-way traffic, the traffic analysis performed by Urban Systems Inc. (2010a) suggested that making this street one way would reduce potential traffic at Canal Street and South Dorgenois in the vicinity of the VAMC. To reduce potential impacts to property owners along South Dorgenois Street, VA is in agreement that it is unlikely that making this street one-way is a necessary modification. Section 5.3 has been modified to reflect this change. Leaving the street as a two-way street is not anticipated to cause significant impacts to traffic in the surrounding area.

COMMENT

There is virtually no discussion about the impact on the adjacent residential structures from turning South Rocheblave Street into a two lane street (three, with a turning lane). How would widening of this street be accommodated? Will frontage be taken from the neighborhood side?

RESPONSE

VA and the City are currently in discussions as to how to widen South Rocheblave Street. So far, it has been established that any additional right of way would be taken from the VA side of the street. The logistical details of the final configuration are still under discussion.

COMMENTS

- Canal Street, Tulane Avenue, the Pontchartrain Expressway, are all barely adequate to move traffic in and out of the CBD, much less additional traffic to be generated by the new VA Medical Center. Consideration should be given to leaving Banks Street open. From a transportation standpoint, Banks is an important alternative throughway for traffic between Tulane and Canal. It does not have the pesky 'no left turn' signs at almost every intersection like Tulane and

Canal and it is a perfect middle ground between the narrow 'oneways' of Palmyra and Cleveland and the 3-lane monsters of Tulane and Canal.

- From a cultural resource perspective, I feel that few streets capture the authentic essence of a residential, neutral ground better than Banks. The loss of even a small strip of Banks is saddening.
- Because the Dixie building and its annex are non-essential research facilities and it appears from the drawings that there is already going to be a elevated pedestrian crossing, it just does not seem necessary to remove the street.

RESPONSE

The proposed action and alternatives for the replacement VAMC all include the removal of three blocks of Banks Street. This would occur approximately two blocks from where the street begins. Potentially, these two blocks will also be removed by the development of the adjacent UMC. Thus, only a total of five blocks of Banks Street would be closed to vehicular traffic, at only one end of an approximately 30 block long street. VA has endeavored to keep the beginning of Banks Street in spirit, although not in function. The retention of the live oaks and the pedestrian landscaped promenades would approximate the beginning of this street and lead into the actual street in an appealing and relatively seamless manor. As a traffic throughway, traffic on this portion of Banks Street can be easily rerouted to Tulane Avenue. The loss of these three blocks would not cause significant difficulties in traversing the area between Tulane Avenue and Canal Street, as Tulane Avenue is only one, or less than one, block away. Access to the other portion of Banks Street could easily be accomplished by turning onto South Broad, two blocks away. Due to security reasons, this street cannot remain open to public vehicular traffic. The remaining 25 blocks of Banks Street will continue to embody the attributes of a small scale residential neutral ground reminiscent of the rest of New Orleans.

COMMENTS

- Inadequate consideration has been given to the very real possibility that visitors, patients and employees at the hospital will park on the public streets around the hospital, thereby having a negative effect on the remaining businesses and homeowners.
- The proposed staff parking garage continues to be unnecessarily large, based on assumptions regarding single-occupancy vehicles that are unjustified and inconsistent with federal buildings elsewhere. Justification for the projected 954 employee parking spaces was requested over a year ago and has not been provided. In Washington, DC, federal agencies are required to actively promote the use of transit and carpooling, and new buildings are required to carry a 1:4 parking ratio (1 space for every 4 employees). What assumptions were applied here?
- The size of the staff parking structure, which will be the most harmful to the Mid-City Historic District, can and should be downsized by reducing the number of spaces allocated.

- Although access to transit was supposedly one of the factors used to justify the site selection, transit is barely even mentioned. In contrast to patients, staff transportation can rely much more heavily on transit and carpooling, which should be strongly encouraged.

RESPONSE

The amount of parking required for the replacement VAMC was determined using VA standard parking calculations as included in Appendix D. The existing VAMC had 700 parking spaces, the new VAMC will have 2,000 with 1,000 each dedicated to staff and patients/visitors. It is anticipated that parking will be adequate to suit the needs of the new facility. For all, staff, patients, visitors, and neighbors it is preferable parking in a garage on campus, rather than in the surrounding neighborhoods. It is anticipated that a portion of the staff will either use public transit or carpool and these methods will be encouraged at the replacement VAMC. However, if it is discovered that parking is inadequate to meet the need VA would implement a parking program in which patients would be given a pass to enter the garage a limited period of time before their appointment begins to keep a tight control on the number of vehicles in the garage at any one period of time. Residents of neighborhoods around the VAMC would also be able to approach the city to request no parking signs should street parking become an issue.

COMMENT

There is nothing to promote pedestrian activity in this proposed medical district. A better, more concentrated use of land could provide a pedestrian-friendly, walkable medical district - and have significantly less environmental impact.

RESPONSE

VA has taken steps to ensure the VAMC integrates with the surrounding area, through the use of landscaping and choice of materials and design. Due to federal security requirements, the VAMC campus must follow and maintain strict access guidelines. Typically a VA medical center would be surrounded by an 8-foot security fence. SLVHCS obtained permission to use other methods such as low walls and landscaping to replace the need for such a structure, however the VAMC facilities and grounds will still be restricted access to veterans, their visitors, and employees. The design and arrangement of the VAMC campus is that determined to best meet the purpose and need of the facility, providing quality healthcare to the area's veterans.

COMMENT

VAMC is a willing participant in the possible closure of streets within the footprint, and should be held responsible to ensure that these closures comply with the City Charter. Closure of streets erase the traditional grid pattern and creates superblocks that are distinct and alien from the traditional pedestrian character of New Orleans. A more detailed analysis is needed.

RESPONSE

A hearing for the New Orleans City Planning Commission (CPC) was held on 23 February 2010. At this meeting, after hearing input from supporters and opponents of the action, the CPC voted to approve the closure of city streets in the VAMC footprint. The

matter will next be heard by the New Orleans City Council. Per the MOU (Appendix B), it is the City's responsibility to obtain, prepare, and deliver the site to the VA in a construction-ready state, with certain structures (above and below-ground) and pavements removed. VA has no control over the governing process in New Orleans but is confident the City will follow standard legal procedures during this process.

Air Quality

Approximately 2.9% of comments related to air quality. These comments are summarized below:

COMMENTS

- What is the status of the air quality permit application? When will the air quality permit process be complete? Does completion of the NEPA process require waiting until the air permitting process is complete?
- The Draft SEA states that a permit would likely be required for the Central Energy Plant because potential emissions for nitrogen oxides (NOx) "would likely exceed the major source threshold of 100 tons per year" (Draft SEA page 3-71). More information needs to be disclosed about the impact of this pollutant and the effect of exceeding the standard.

RESPONSE

The air emissions permit application process cannot begin until all equipment needs have been finalized and specifics regarding the individual pieces of equipment are proposed. The air emission permit process is composed of two steps, Permit-to-Construct and Permit-to-Operate. The permit-to-construct process will be completed before construction begins on the CEP. Regardless of which type of permit is required, a public comment opportunity is part of the process.

COMMENT

The CO impact analysis states that a "microscale hot spot impact modeling analysis" would be required for intersections where the traffic study projected that the Level of Service (LOS) might decrease below level D as compared to existing conditions (Draft SEA page 3-68). The Draft SEA then cites an August 2009 traffic study by Urban Systems, which apparently concluded that all of the intersections would operate at LOS C or better. However, information in the January 2010 Urban Systems study appears to contradict this conclusion. It identifies five locations at which the LOS would deteriorate to level D, and one location where the LOS would deteriorate to level E: Tulane Ave. eastbound @ S. Broad St. during AM Peak (Table 7, page 1-22) (LOS D); Tulane Ave. westbound @ S. Broad St. during PM Peak (Table 8, page 1-24) (LOS D); S. Galvez St. northbound @ Tulane Ave. during PM Peak (Table 8, page 1-24) (LOS D); N. Dorgenois southbound @ Canal St. during AM Peak (Table 9, page 1-26) (LOS D); S. Dorgenois southbound @ Tulane Ave. during PM Peak (Table 9, page 1-26) (LOS D); S. Rocheblave St. southbound @ Tulane Ave. during PM Peak (Table 8, page 1-25) (LOS

E). The January 2010 traffic study appears to show that a microscale hot spot impact modeling analysis is required after all. This analysis needs to be conducted, and the results disclosed to the public, before any final decision is made.

RESPONSE

The Urban Systems Traffic Impact Analysis August 2009 citation was incorrect, the citation should have been for the final version of that document which was completed in January 2010. There were no substantive changes between the draft and the final document. Those references have been corrected in the SEA.

As described in the CO Impact Analysis subsection of Section 3.6.5, a microscale hot spot impact modeling analysis would only be required for intersections where the projected LOS would decrease below level D as compared to existing conditions. This means the LOS rating for the entire intersection would be below level D. The Urban Systems January 2010 Traffic Impact Analysis does describe that certain “links” or directional segments of certain intersections may have an LOS of D or lower. A link is a section of the road, for example, the eastbound lane of Tulane Avenue at South Galvez Street is one link of the Tulane Avenue/South Galvez Street intersection. Therefore, a four way intersection would have four different links at a minimum. The overall average LOS rating for the intersection is determined by averaging the ratings of all the links. As determined in the Urban Systems Traffic Impact Analysis, no intersections would be anticipated to have an average LOS lower than D. Therefore, no microscale hot spot impact modeling analysis would be required.

COMMENTS

- When will further air quality analysis be available? The air quality analysis is deficient and incomplete.
- Analysis of emissions from the Central Energy Plant is incomplete. The VA has not completed an “ambient concentration dispersion modeling analysis,” which is necessary in order to determine what the resulting pollution levels will be from those emissions. The Draft SEA acknowledges that the study is underway, and that it will be completed as the design of the CEP is refined. If the impacts are significant, however, modifications may be required to the height and/or configuration of the stacks for the boilers. These design changes, in turn, could exacerbate adverse visual impacts.
- Deferral of these studies beyond this Tier II NEPA document has the effect of sweeping under the rug information that could be critical regarding the air quality impacts of the project. Without these additional studies, there is no way for the agency or the public to know whether air quality impacts may be significant.

RESPONSE

The full air quality analysis is now complete. Section 3.6.5 of the document has been updated with the findings and Appendix E has been added to the document to detail the modeling process and results. The results of the ambient concentration dispersion modeling analysis have determined that there are no anticipated impacts to air quality as a result of the operations of the CEP.

Noise and Vibration

Approximately 1.8% of comments related to noise and vibrations. Concerns included use of Bureau of Mines standards, the lack of a noise survey on the VAMC site, and construction noise impacts. These comments are summarized below.

COMMENTS

- Although a noise level assessment was performed on the UMC site, it has not been on the VAMC site. Why was this not done and when will this assessment happen? Failure to do a survey of existing noise levels (an easy and inexpensive study to complete) certainly creates the impression that the VA is attempting to conceal the true magnitude of these impacts from the public.
- To say the existing noise levels in parts of the project site already exceed "acceptable" residential levels, therefore the additional traffic noise increase is barely perceptible - still makes it exceed acceptable ranges.
- Without conducting the noise survey, the Draft SEA assumes that existing noise levels within the VA footprint are 65 to 75 dBA (Draft SEA page 3-79). However, the noise data from the adjacent UMC site do not support this assumption (Draft SEA page 3-77, Figure 3-21). The Draft SEA acknowledges that ambient noise levels for the VA site are estimated to be quieter than those within the LSU footprint, "because the area has more residential properties and there would be less influence from traffic on I-10 due to its distance from the site" (Draft SEA page 3-77). Yet, contrary to this common-sense caveat, the Draft SEA then adopts as the basis for its assumption the noise levels in the portion of the LSU site that is the loudest and closest to I-10 (the red and orange areas on the map), rather than the quieter portion of the UMC site (the blue areas on the map), which are closer to the VA site. Instead of existing noise levels ranging from 65 to 75 dBA, as the Draft SEA assumes, Figure 3-21 actually suggests that noise levels at the VA site and in the blocks across the street to the north of the site are more likely to be in the range of 56.7 to 67.4 dBA, which is roughly half the perceived noise level of a 65 to 75 dBA range. (Of course, these existing noise levels should be easy to verify, but the VA provides no explanation for failing to do so.)

RESPONSE

Due to the similarities of land use on and the adjacency of the replacement VAMC and the UMC project sites, the ambient noise on the VAMC site can be extrapolated from the UMC noise study. Based on the comments received, VA has re-evaluated and revised the estimated ambient noise levels on the replacement VAMC to range from 57 to 72 dBA as discussed in Section 3.7.1. Based on that extrapolation, it can be assumed that the interior of the VAMC site would include ambient noise levels similar to noise levels in the interior of the UMC site as both areas are primarily residential. Because the VAMC site is more populated, interior noise levels may actually be slightly higher than the interior noise levels at the UMC site, but to be conservative, the lower noise level was

used in the noise analysis. The land use and noise levels along the Canal Street, Tulane Avenue, and South Galvez Street perimeters of both sites are also very similar. Therefore, estimated noise levels for the VAMC site range from 57 dBA in the interior to 72 dBA along the major roadways. Though isolated locations along Canal Street and Tulane Avenue on the UMC perimeter spike above 74 dBA, to be conservative, the lower limit is used to determine overall ambient noise levels on the VAMC site.

COMMENT

The Draft SEA then exacerbates its false assumptions that existing noise levels are relatively loud by downplaying the noise levels that would result from pile driving during construction. Even though Table 3-12 lists pile driving at 101 dBA (Draft SEA page 3-78) the noise chapter downplays these impacts by stating that pile driving noise is estimated at an “hourly Leq in a range of 75 to 85 dBA,” (Draft SEA page 3-79). There is simply no substantiation for this estimate. Presumably, the Draft SEA is using an hourly averaging technique as a way to understate and disguise the true magnitude of the construction noise impacts.

RESPONSE

Pile driving is an intermittent process that creates short bursts of noise only at the moment of impact. While the noise generated by pile driving activities certainly contributes to a higher noise environment, the noise burst is a very short duration and is at its peak level only at the location of the pile driver. Noise attenuates slowly over distance. The estimated hourly Leq in a range of 75 to 85 dBA is calculated by factoring in the pile driver noise, the other operating construction equipment and the separation distance between the pile driver and the sensitive receptors as discussed in Appendix F. VA acknowledges that construction activities will create higher than average noise levels over a short period of time. These noise levels are in accordance with the construction noise that is occurring throughout the city at other construction sites. The expected noise levels are below the FTA noise criteria standards as discussed in Section 3.7. Additionally, VA’s construction contractors would operate within the city noise ordinances that require construction to occur between the hours of 7 am and 6 pm in conjunction with the use of mufflers on construction equipment. VA maintains that implementation of these steps will result in the minimization of any potential adverse impacts to the ambient noise environment as a result of construction activities for the replacement VAMC.

COMMENT

The Draft SEA states that the standards developed by the U.S. Bureau of Mines provide for a vibration threshold of 0.5 inches/second peak particle velocity (ppv) for historic structures (Draft SEA page 3-75). Actually, this is the standard applicable to “normal” buildings. The Bureau of Mines standards for historic structures are more stringent than this. Recommended vibration thresholds are 0.2 inches/second for “fragile buildings” and 0.12 inches/second for “extremely fragile historic buildings.” One of these more conservative standards should be used for historic properties in New Orleans.

RESPONSE

As agreed in the PA, VA will establish a Vibration Monitoring Program developed by a structural engineer experienced in traditional materials who will take into account local conditions. The Vibration Monitoring Program will reference the Bureau of Mines and Federal Transit Administration's vibration standards. VA is also considering adoption of the US Army Corps of Engineers standard for New Orleans, 0.25 inches per second. Calculations (Section 3.7.2), regarding vibrations that would be experienced during construction reveal that adjacent properties would only experience PPVs of 0.1 inches per second or less. This is below the Bureau of Mines levels listed for both fragile buildings and extremely fragile historic buildings. VA has conducted a preliminary vibration study to determine the existing vibration conditions around the project area. This study, presented in Appendix F, and added to the discussion in Section 3.7.2, indicated that existing vibrations range from 0.00596 to 0.735 inches per second. The Vibration Monitoring Plan would include devices placed near sensitive structures which would constantly monitor vibrations experienced by these buildings. It would contain stop work conditions in the event that the PPV level set by the engineers is exceeded and reporting protocols designed to inform both the engineer and the construction personnel of the exceedences and to direct them to eliminate or alter whichever process is causing them to occur. It is also recommended that pre-construction surveys are done of all sensitive buildings nearby. These surveys would measure existing cracks and/or tilts and levels in these structures. The buildings would then be monitored periodically during construction to make sure no additional damage was occurring.

Infrastructure

Approximately 4.7% of comments addressed infrastructure concerns related to the amount of changes to be made and the potential impacts of those changes, particularly to the live oaks on and surrounding the site. These comments are summarized below.

COMMENTS

- In the PEA, all current infrastructure was going to be used. The Draft SEA says they are going to reroute utilities and make huge changes. Why is this information just coming to light?
- Contrary to the PEA, the Draft SEA now discloses that infrastructure impacts will be dramatically more significant than previously estimated. Both the PEA and the Draft SEA start with the same premise—that demands on existing infrastructure will return from current levels to “near or above pre-Katrina levels” (PEA page 3-24; Draft SEA page 3-82). The PEA concluded that: “[T]he existing systems and services are thought to be adequate for the proposed facilities. If upgrades to these systems are required to support the new facilities, these upgrades would be designed to increase the systems’ overall performance and reliability,” “existing utility services provide reliable sources of water, sewer, and drainage at the site, and are ready for use,” and “electric service is adequate for the proposed Tulane/Gravier sites, and high pressure natural gas is available to service the

needs of a hospital site comparable in size and load as the current VAMC” (PEA page 3-24). By contrast, the Draft SEA now discloses that all infrastructure and utilities within the site will be torn out and completely reconstructed (Draft SEA 3-82 to 3-85).

- There is an abundance of changes in the infrastructure - with the additional note that private utilities would develop their own plans for relocation. What is being done to make sure efforts are coordinated?

RESPONSE

The current infrastructure in the Tulane/Gravier area continues to be considered adequate to support the replacement VAMC campus at or above pre-Katrina levels. Modifications to the infrastructure within the site are related to removal of the old drainage network that followed the interior roads and development of a replacement drainage network to conform to the new building placement and design. The change in configuration related to the placement of the buildings and the proposed changes to the topography of the site dictates changes in the configuration of the underground utilities on-site. For example, building foundations cannot be installed without first removing the underlying existing sewer, gas and water delivery pipelines. The existing streets will have to be removed prior to grading and construction. Utility networks must be rerouted around the site due to the need to place foundations for the buildings. Additionally, it will be necessary to install internal infrastructure necessary amongst the replacement VAMC buildings. These potential connections would include large underground plumbing and sewer systems and energy transfer infrastructure (from the CEP to the rest of the facility). Modifications to infrastructure outside of the project site will be minimal and related to tying the campus into the overall City system. City has chosen to make some infrastructure improvements to update the system while making the changes necessary to tie the VAMC campus into the City drainage system. These changes were not mandated by the construction of the replacement VAMC, but this was taken as an opportunity to make system improvements. Such changes should improve drainage around the perimeter of the VAMC campus.

COMMENT

What is the cost of these changes to the infrastructure? Who will bear the cost of these changes? What are the assurances that this will not delay the project?

RESPONSE

The City of New Orleans, per the agreement with VA in the MOU (Appendix B) will bear the cost of the required infrastructure changes. Stipulations within the MOU mandate that such changes will be complete upon final delivery of the site. City and VA negotiated the delivery schedule so that both parties were comfortable with the delivery timeline. Time allotted for the necessary changes included a buffer to allow for possible short-term delays. Therefore, it is not anticipated that infrastructure changes would cause a delay for the overall project.

COMMENTS

- The Draft SEA states that service interruption during infrastructure changes is expected to last only a few hours. Is this realistic - considering the major rerouting that will occur? This assumption defies credibility given the magnitude of the reconstruction involved.
- The impacts to “Infrastructure/Utilities – Electrical, Natural Gas and Telecommunications” (Draft SEA page 2-28) appear seriously understated. It is difficult to believe that the impact on services to surrounding neighborhoods would be “minimal” when 30 acres and 12 square blocks of these utilities would be completely torn out and replaced.

RESPONSE

Although 30 acres of infrastructure from the existing site and the structures and roadways that utilized those networks will be removed, the infrastructure for the surrounding neighborhoods will remain in place and connected to the main systems. Any changes related to maintaining the connections between existing neighborhood networks and the main infrastructure networks will be emplaced before the old connections are terminated, resulting in temporary and minor service interruptions during the switch over process. Therefore, this should result in only temporary and minor service interruptions as the networks are switched over. VA maintains that potential impacts related to service interruptions from infrastructure changes would be minor.

COMMENTS

- What is being done to make sure that trees will be unharmed and root damage prevented during removal of underground utilities?
- No information is provided regarding the horizontal and vertical root zone for the trees along Banks Street, or the relationship between that root zone and the water and electrical lines. The Draft SEA rejects the alternative of creating a utility servitude around the perimeter of the VA site specifically and solely because of the adverse impacts that the utility relocations would have on the existing live oak trees along Canal and South Rocheblave Streets (Draft SEA page 3-83). If the risk of damage to oak trees along Canal Street is so great as to require rejecting that alternative, the Draft SEA fails to explain why the risk of damage to oak trees along Banks Street is not even greater, since Banks Street is only half the width of Canal Street, and therefore the root zone of the trees would be more difficult to avoid. Although the option of “directional boring” is mentioned for placing new electrical and telecommunications lines as a way to reduce the risk of damage to oak trees along Canal Street (Draft SEA pages 3-83 and 3-85), directional boring is not an option for the removal of water and sewer lines.
- New water and sewer lines would be installed along South Rocheblave Street, and along the south side of Canal Street between South Rocheblave and South Tonti Streets—precisely the locations where the oak trees presented too great a risk of damage to consider the utility servitude (Draft SEA page 3-83 to 3-84).

RESPONSE

The VA is committed to retaining as many of the existing trees on both Banks and Canal Streets as possible. During construction, fencing will be placed around the trees to prevent accidental trunk damage. The roots of most tree species typically extend to the drip line of the canopy. Live oaks, however, have a smaller root expanse. This can be calculated by measuring the diameter of the tree at 4.5 feet above the ground (in inches), and multiplying this number by 0.9, this resulting number is the diameter of the root plate in feet (or one half this number would be the radius) (Coder, 2003). VA's construction team will make every effort to calculate this distance and remain outside of it to protect the roots of the existing trees. Every effort will be made to avoid any damage to the trees and their roots. The root system generally extends up to 40 inches below the surface and is susceptible to damage from fill and compaction. As the portions of the VAMC campus where trees will be retained are to remain at grade, very little use of fill is anticipated in the treed areas. The 'removal' of sewer and water lines along Banks Street may not involve excavation. It is possible that the construction team could simply cap off the lines at the edges of the VAMC site. Directional boring may be used to supply new telecommunications and electrical lines throughout the campus, and every effort would be made to avoid damage to the root systems. New water and sewer lines along Canal and South Rocheblave Streets would be installed under the roadways and therefore would not impact the live oaks.

Cultural Resources

Approximately 7.3% of comments related to cultural resources, both regarding impacts to these the historic structures and districts, and regarding compliance with PA stipulations. These comments are summarized below.

COMMENTS

- It is alarming to read that the "existing VAMC has deteriorated due to damages sustained during Hurricane Katrina" (Draft SEA page 3-89). If properly ventilated and secured over the last 4.5 years, deterioration would not have happened. When will the buildings be properly secured?
- Another flaw in the analysis of the No Action Alternative is that it contains the surprising assumption that the VA would violate the Section 106 PA. The Draft SEA states that the historic buildings in the existing VAMC complex "would *continue* to suffer from neglect," "[i]f not properly vented and secured," SEA at 3-89 (emphasis added). The PA, however, explicitly requires that the "VA will continue to secure and ventilate the former VAMC . . . to avoid further deterioration of the buildings." PA at p.7 (Stipulation V.B.2.(b)). That requirement is an explicit condition of the VA selecting the "RPC" site in Tier I, which is a decision the VA has already made. That requirement is characterized in the PA as a commitment that is supposed to "Avoid" adverse effects. Is the VA suggesting that it has not complied with this requirement in the PA, or that it does not intend to comply with the PA in the future? Is the Draft SEA suggesting that

this stipulation was falsely characterized in the PA as one that would “avoid” adverse effects? If the VA intends to comply with the PA, the “neglect” scenario portrayed in the Draft SEA would not be an option.

RESPONSE

The existing VAMC has deteriorated due to damages sustained during Hurricane Katrina as described in Section 2.3.1 of the PEA. Once the floodwaters receded, VA returned to the facility, pumped out the water which had flooded the basement, and secured and ventilated the campus to ensure no additional deterioration occurred. The described deterioration was that inflicted by the storm and the flood waters. The VA continues to maintain the security and ventilation of the existing facilities and will until final disposition of the campus and buildings is determined. The existing facility is and has been properly secured since it was closed following Hurricane Katrina.

COMMENTS

- It was recently announced that the old VAMC might be used as a Skilled Nursing Hospital in the future. This is contrary to what we have been told - that the building could not be used for medical purposes. We question this whole process if now it is able to be used for our most infirm.
- What happens to the buildings vacated and left in the Medical Historic District? What plan is there for revitalization of the area? The impact of not revitalizing this area is significant and should be included in the SEA.

RESPONSE

As VA announced in the 2006 Report to Congress on Plans for Re-establishing a VA Medical Center in New Orleans, damages to the facility make it unsuitable for continued use as a medical facility. The VA has no intention of using the facility for medical purposes in the future and is unaware of any other parties interested in using it in such a way. Final disposition of the existing facilities will be determined in a subsequent SEA.

COMMENT

Would the two to four houses that are to be reused and integrated into the facility along South Rocheblave Street only be included in Alternative # 4 or would that be for all alternatives?

RESPONSE

The two to four existing structures would be integrated into the existing facility for all alternatives. Should an alternative other than Alternative # 4 be selected, the design plans would be modified to determine how best to incorporate those structures.

COMMENT

Have the four houses to be integrated into the facility already been chosen if not when will they be? Are those limited to those structures that are already on South Rocheblave Street or can they be chosen from across the site? Are there stipulations for what kinds of homes can be chosen as one of the four that can be integrated into the facility?

RESPONSE

Potential choices for the two to four existing structures that would be integrated into the VAMC have been identified, but final decisions are dependent on homeowner choices regarding relocation options, assessment of the structural stability and condition, and assessment of the suitability for the medical program needs for which the facilities would be used. Potential structures for reuse can be selected from across the site, they are not restricted to those already present along South Rocheblave Street. Potential structures for reuse must also be those the original owner chose not to move and which have subsequently been acquired by the State on behalf of the City.

COMMENT

Disappointed that the number of historic homes to be used for rehabilitation, transitional living, and lodging for visiting families has been reduced to as few as two.

RESPONSE

VA has determined that it can potentially utilize two to four existing structures based on the services and workload expected for the replacement VAMC facility in addition to budgetary considerations. It would be irresponsible for VA to preserve additional structures with no ability to use or maintain them.

COMMENTS

- Shouldn't the SEA include the mitigation? When will the mitigation program be finalized - and will it be posted on the website?
- The Draft SEA provides no new information whatsoever regarding the Mid-City historic preservation mitigation program, which was supposed to provide up to \$1.1 million from the VA and the City for historic preservation projects within the portion of the Mid-City Historic District not destroyed by the project. PA at pp. 4 and 11 (Whereas Clause #22 and Stipulation V.B.4.(a)). The PA provides that the program is "not to exceed three years," (Whereas Clause #22). Almost half that time has already elapsed, yet the Draft SEA fails to provide any information about the status of the program or any evidence that it is more than a pipe-dream at this point.

RESPONSE

Mitigation measures related to site selection were delineated in the PA and current compliance efforts with respect to these measures are delineated in section 3.9 of the SEA. Section 5.0 of the SEA includes a summary of mitigation measures relevant to the evaluation in the SEA. Measures designed to minimize potential impacts on the surrounding area as a result of construction and operations of the replacement VAMC are addressed throughout the document and summarized in section 3.9.3.

As described in section 3.9.3.6 VA has committed \$700,000 in funding for the Historic Preservation Mitigation Program per Stipulation V.C.4.(a).i of the PA. Currently SHPO is in the process of designing that program. Once information is available about this program it will be shared on the consulting parties website.

COMMENT

It is misleading to say "treatment measures to resolve these adverse effects were developed..." They are not resolved.

RESPONSE

Treatment measures to resolve potential adverse impacts to the surrounding area were developed with the participation of consulting parties including representatives of city organizations, local and national historic preservation groups, local neighborhood organizations, local tribal governments, and other interested stakeholders. These treatment measures were agreed to in the PA and are summarized in the PEA. Updates regarding the process of compliance with these treatment measures are included in section 3.9 of the SEA. It is VA's belief that these treatment measures adequately resolve potential adverse effects to the level of being not significant.

COMMENT

To say that the 12 blocks deemed for seizure and demolition represent "only 4% of the total number of blocks of the Mid-City National Register Historic District attempts to minimize the impact of the VAMC. Each percentage point that chips away is a huge loss to an historic district. Consider a 4% loss of the French Quarter. It is clear that the proposed action will have huge adverse affects on the character of the Mid-City NRHD. Would the VA contend that demolishing 4.4 percent of all the historic properties in the City of New Orleans, or 7 percent of all the contributing blocks in the City of New Orleans, is insignificant because 4 or 7 sounds like a small number? This reasoning has the effect of demeaning and dismissing the importance of the resource that is threatened.

RESPONSE

Potential impacts due to site selection and site preparation, including demolition, were addressed in the PEA. VA maintains that the treatment measures agreed to in the PA adequately mitigate the impacts to the Mid-City NRHD as a result of construction of the replacement VAMC on the Tulane/Gravier site.

COMMENT

The cumulative impact of this traffic, along with the adverse impact of the VA medical center itself, is likely to have an indirect adverse impact on the adjacent small-scale historic homes in the Mid-City Historic District, as they become extremely unpleasant places to live. Those homes are completely unprotected at this time from speculative demolition. This impact is not adequately considered.

RESPONSE

Section 3.9 of the SEA summarizes impacts already addressed in the PEA regarding cultural resources and provides an update of the current status of compliance with the PA. Cumulative traffic impacts are addressed in section 4.4 of the SEA, and in sections A-2.5 and A-2.10.3 of this appendix. VA maintains that potential impacts to the adjacent neighborhood will be minimized as a result of design modifications. The Mid-City Neighborhood Organization has submitted the request that the Mid-City NRHD become a Local Historic District using the data supplied by FEMA per Stipulation V.B.4.(e) of the PA. The New Orleans Historic District Landmark Commission is in the process of

reviewing this application. This designation should provide additional protection to the entire district, including those homes adjacent to the VAMC.

COMMENTS

- South Rocheblave Street itself would be converted to a two-way street, and portions of South Rocheblave Street would be widened to three travel lanes, including the block closest to Canal Street (Draft SEA page 5-3), which is where the vast majority of the live oaks along South Rocheblave Street are located. This widening of South Rocheblave Street would either destroy the live oak trees along the south side of the street, or would destroy historic buildings along the north side of the street—or both. The historic buildings on the north side of South Rocheblave Street, which are contributors to the Mid-City Historic District, were never previously considered or disclosed as being directly threatened by the construction of the project and its necessary infrastructure, either under NEPA or Section 106. (Instead, it was assumed that they may be adversely affected by the indirect impacts of land use changes generated by the new VA hospital.) In any case, they remain completely unprotected.
- Meanwhile, what the Draft SEA *has* revealed is that the threat to the Mid-City historic properties just across South Rocheblave Street from the VA site is more alarming and immediate than previously feared. As discussed above, the potential destruction of these historic properties as direct victims of road construction and infrastructure removal and replacement for the VA hospital was never taken into account in the Section 106 process, and these historic properties are not protected from demolition.

RESPONSE

As discussed above, should the widening of South Rocheblave Street require additional land it would be accommodated on the VAMC site, not on the neighborhood side of the street. The homes located along South Rocheblave Street are not threatened by the construction of the project or the infrastructure changes, no additional acquisition of property would be required to accommodate the widening of South Rocheblave Street.

COMMENT

The impacts of the No Action Alternative on historic buildings are seriously misstated. The Draft SEA concedes that there would be “some beneficial impacts” to historic properties if the No Action Alternative were selected, because the owners of homes and businesses would likely seek building permits to repair their properties. It fails to consider, however, the beneficial impact that up to 123 historic properties would be saved from destruction by this alternative.

RESPONSE:

Section 3.9.2.2 of the SEA has been updated to include that potential impact.

COMMENTS

- Thought that it was not possible to salvage flooring because it was submerged in the floodwaters and that is why it was not included in the salvage plan? It is contradictory to say VA can salvage some for architectural features now.
- The Draft SEA states that the VA would “consider” salvaging original wood flooring from a “specified number of buildings” and integrating them as an artistic feature of the concourse interior design (Draft SEA page 3-94). However, the Preservation Resource Center has apparently been advised by the demolition contractor that flooring would not be salvaged. This needs further explanation.

RESPONSE

As discussed above, while VA would consider salvaging original wood flooring from structures currently present on site, and integrating the flooring as an artistic feature of the central concourse interior design, there are a number of feasibility issues (financial, schedule, and liability considerations and analysis of the availability of flooring in acceptable condition) that must be considered and coordinated with the City and State before a final decision can be made. The recovery of such flooring would be a separate process from the architectural salvage program and would not involve the PRC or other agency conducting salvage under the stipulations of the PA.

COMMENTS

- The lack of detail regarding the “house moving” program is shocking, in light of the fact that the acquisition of properties is already underway. The VA’s entire conclusion in Tier I that significant impacts on historic properties will be reduced to an insignificant level—(which we have objected to from the outset)—hinges on this relocation program, which would provide funding for the relocation of up to 20 one-story historic homes of “exceptional architectural importance,” out of the 123 historic properties that would otherwise be destroyed on the VA site. PA at pp. 8-9 (Stipulation V.B.3.) The failure to disclose any details at all, nearly 15 months after the PA was signed, strongly suggests that the hoped-for reduction in the numbers of homes to be demolished has not materialized, and directly calls into question the VA’s conclusion that impacts on historic properties will be insignificant.
- How many properties have been identified as “one-story residential buildings of exceptional architectural importance,” as required by the PA? Have the buildings been “prioritize[d]” as required? Will the two to four historic properties proposed for transitional living along South Rocheblave Street be taken from the top of this prioritized list? If not, why not, and how will these historic properties be selected? What has been the response of the property owners who have been notified that up to \$40,000 may be available to cover costs associated with moving their homes? How many owners have accepted this offer? Have any vacant lots within the Mid-City Historic District been identified as suitable sites for relocated homes? If so, how many, and where? Have any cost estimates for relocation been obtained? When will relocations take place, *if any*? The failure of the Draft SEA to address any of these questions, when the property acquisition process is already

underway, strongly suggests that the answers would only reveal the glaring ineffectiveness of this mitigation measure. Without it, the VA's Tier I FONSI collapses like a house of cards.

RESPONSE

To protect homeowners privacy during their decision making process regarding whether they will move their homes under this program, it is not possible to provide details regarding the individual homes deemed suitable for the house moving program at this time. Vacant lots within the Mid-City Historic District have been identified that would be suitable for the homes deemed eligible for the program. Again due to privacy concerns it is not possible at this time to reveal details about these lots. Cost estimates for relocation are currently being negotiated by the SHPO who is facilitating this program. When appropriate those details will be made available on the consulting parties website. It is possible that some of these one-story residential buildings of exceptional architectural importance will be selected as some of the homes to be integrated into the replacement VAMC for rehabilitation and transitional living. However, VA would also require homes that have multiple stories for use in assisting veterans who need to re-adapt to using stairs following certain medical procedures. Final decisions regarding which structures will be used are dependent on homeowner choices regarding relocation options, assessment of the structural stability and condition, and assessment of the suitability for the medical program needs for which the facilities would be used.

COMMENT

The Draft SEA inaccurately cites to Stipulation V.C.4.(a).i. (SEA at 3-96), which relates to recordation in the event the Lindy Boggs site is selected.

RESPONSE

This reference has been corrected in the text. The correct reference is V.B.3.(a).i.

COMMENT

The provision in the PA for local historic district designation was supposed to be designed to address the long-term cumulative impacts of the medical centers on the remaining portion of the Mid-City Historic District, by providing a mechanism for regulating the inevitable demolition pressure on historic properties outside the footprint of the medical centers themselves. It was encouraging to read that the Historic District Landmark Commission (HDLC) has established a study committee to prepare a report on local designation (Draft SEA at 3-96). However, no estimated timetable was provided, and this mitigation measure is likely to be "too little, too late." Only undisclosed "parts of" the Mid-City Historic District are being considered for designation, *id.*, and even historic district designation is unlikely to be enough to save the historic homes closest to the VA hospital. These homes will be forced to endure the tearing up, reconstruction, and widening of S. Rocheblave Street, the staggering noise and vibration impacts of construction, followed by the traffic and noise impacts of having ambulances and daily commuters clogging what is currently a one-way street, with the emergency entrance looming 23.33 feet above the street level. The resulting speculative demolition pressure on these historic homes will be enormous as the blocks closest to the hospital will

become unbearable places to live. These historic homes remain completely unprotected at this point.

RESPONSE

VA maintains that potential adverse impacts to the adjacent neighborhood will be minimized as a result of design modifications described throughout the SEA. The Mid-City Neighborhood Organization has submitted the request that the Mid-City NRHD become a Local Historic District using the data supplied by FEMA per Stipulation V.B.4.(e) of the PA. The New Orleans Historic District Landmark Commission is in the process of reviewing this application. This designation should provide additional protection to the entire district, including those homes adjacent to the VAMC.

Cumulative Impacts

Approximately 13% of comments related to cumulative impacts. The majority of comments focused on cumulative impacts in conjunction with the adjacent UMC facility. Comments regarding cumulative impacts are summarized below.

COMMENTS

- How are we supposed to evaluate cumulative impacts of both hospitals together when don't have information on LSU hospital? Co-location was crucial in choosing the sites, therefore all the impacts associated with co-location need to be thoroughly examined.
- To say the VAMC has been closely coordinated with the future LSU site plan is contrary to other statements made at public meetings and in the SEA.

RESPONSE

The replacement VAMC and the new UMC are independent projects being constructed by separate agencies. These projects are moving forward at different rates for a variety of reasons. NEPA calls for the evaluation of cumulative impacts based on information available at the time the environmental assessment is completed. VA has remained in close communication with FEMA and the State of Louisiana regarding design plans for the new UMC. VA has made every effort to discuss and analyze potential cumulative impacts considering the proposed UMC adjacent to the VAMC. VA feels that with the information currently available regarding the UMC design, these impacts have been addressed appropriately.

COMMENT

What would be the cumulative environmental impacts of vacating the downtown area and the Historic Medical District?

RESPONSE

The impacts related to the final disposition of the existing VAMC property will be addressed in a subsequent site-specific environmental assessment. As it is not yet clear

who will retain ownership of the property, or what could be done with it after it is vacated, the impacts cannot presently be analyzed. When this SEA is prepared all potential cumulative impacts to the proposed historic medical district will be analyzed.

COMMENT

All areas surrounding the VAMC complex should be considered in the cumulative effects, including the proposed LSU AMC, the CBD, the Medical Historic District, Tulane Medical Center, Cancer Consortium, LSU Health Science Center, and the surrounding neighborhoods. These cumulative impacts of noise, hazardous waste, drainage, transportation, air quality, noise, etc. should be fully analyzed for the entire area.

RESPONSE

VA has included most of these areas and institutions in the cumulative impact analysis, specifically, the UMC (formerly the LSU AMC), the Louisiana Cancer Research Consortium, the New Orleans Bio-Innovation Center, the historic districts and the CBD. These areas and developments are addressed in different ways throughout the SEA and the PEA. Some large scale potential impacts are discussed in the land use sections of both this SEA and the PEA with respect to the historical districts and the CBD. The more specific developments, such as the UMC are discussed in detail in the cumulative impacts section in both this SEA and the PEA. Impacts discussed include noise, hazardous waste, drainage, transportation, and air quality, amongst others.

COMMENTS

- True cumulative impacts have not been considered. The summary on page 4-23 makes it sound like there is no effect or effects would be beneficial in some cases. It is simply not true. It is ludicrous to conclude "the VAMC would not be expected to contribute to significant adverse cumulative impacts on aesthetics, floodplain, waste, noise, infrastructure, cultural resources, or transportation."
- Not enough analysis has been done. A better look at the complete picture of proper land use would be appropriate.
- The chapter on Cumulative Impacts in the Draft SEA repeats the errors, omissions, and inadequacies discussed above. The comments noted above apply to this chapter as well.

RESPONSE

VA believes that with the information available, all possible efforts have been made to evaluate potential cumulative impacts with respect to environmental and cultural resources in the area. Additionally, mitigation measures have been established which would reduce potential impacts to minor or insignificant levels. These mitigation measures are addressed in Chapter 5 of the PEA, and are also addressed in the PA. This SEA discusses further design measures to minimize potential impacts associated with the construction and operations of the replacement VAMC. Land use was thoroughly evaluated in the PEA. No new information in relation to land use was identified during development of the SEA as discussed in section 3.1.

COMMENT

What about the cumulative impacts for energy and sustainability impacts related to demolition of the existing buildings and putting them into landfills?

RESPONSE:

The potential adverse environmental impacts related to demolition were addressed in the PEA as part of the site selection and preparation process in Tier I and are discussed in section 3.8.2.2 of the PEA. The energy efficiency and sustainability discussion in the SEA focuses on the Tier II process related to construction and operations of the replacement VAMC.

COMMENT

A comment was made that placing the high-rise buildings along South Galvez would place them across the street from other high-rise buildings, but that is only dependant on the UMC being built, currently there are no high-rise buildings there. The UMC facility has not been funded yet.

RESPONSE

Currently the UMC is in the design phase. VA has analyzed this development as if it were definite, as it was considered reasonably foreseeable. A governing structure has been agreed upon for the UMC and the governor has appointed the first members to the board. The State of Louisiana has asserted repeatedly its support for the construction of the UMC on the site adjacent to the replacement VAMC. VA anticipates that the UMC will be constructed as planned and has analyzed cumulative impacts in that respect.

COMMENT

During tier one, the VA stated that it needed 25-75 acres as it wanted to build a campus style design. Now that the hospital is being laid out on a 30 acre site, we are told that any future expansion will be done vertically. Building higher at this site will have enormous consequences for the surrounding historic neighborhood and alters many of the assumptions currently being made about the impact to the surrounding neighborhood. I do not believe there has been adequate consideration of this issue in evaluating the desirability and viability of the location and design of this facility.

RESPONSE

If it is decided in the future to expand the replacement VAMC facility, NEPA regulations will require an additional environmental analysis. During this analysis, potential adverse impacts with respect to increasing the heights of the buildings would be examined.

COMMENT

The cumulative aesthetic effect of the changes orchestrated by the VA, detrimentally effect the Mid City neighborhood - producing a sea of institutional buildings that could be anywhere USA.

RESPONSE

VA believes that with the design alterations and characteristics, that the appearance of the replacement VAMC and UMC should be compatible with the surrounding area. Section

4.1 discusses the potential cumulative aesthetic impacts with respect to the VAMC, the UMC, the Louisiana Cancer Research Consortium, the New Orleans Bio-Innovation Center and the new residential developments in the area.

COMMENT

The cumulative effect of sustainability, as well as the lack of sustainability, needs to be studied. What is the effect of vacating the Medical Historic District - along with a sparsely populated CDB - with no plan for revitalization?

RESPONSE

The final disposition of the existing VAMC buildings has not yet been decided. An additional Site-Specific Environmental Assessment will evaluate the consequences of the proposed actions and alternatives. This document will analyze the potential impacts of the alternatives related to the vacating of the existing VAMC buildings. VA has no control over any of the other buildings in the CBD, including the former MCLNO Charity building. Impacts related to external factors will be assessed as potential cumulative impacts, but VA cannot steer the redevelopment of the CBD.

COMMENT

Perhaps one of the most ridiculous statements in the entire Draft SEA is the statement that “[t]he discordant perception of large buildings [comprising the new medical centers] would . . . be moderated by the large open parking areas between the [LSU] buildings and the elevated freeway” (Draft SEA page 4-5). The notion that six square blocks of surface parking lots would serve as a buffer or mitigation measure to ameliorate the adverse visual impact of the two medical centers is absurd.

RESPONSE:

Section 4.1 of the SEA has been expanded to include a more detailed interpretation of the parking area adjacent to the UMC. It is VA’s understanding that this parking area is intended to be temporary in nature pending the expansion of the UMC. Although the parking area would potentially cause an aesthetic impact to the area, it is assumed that this impact will be mitigated by the UMC design features, such as landscaping.

COMMENTS

- Will the UMC side also be elevated and to what amount?
- It has been acknowledged publically several times that the UMC site will also be raised to a height of 1.33 ft above mean sea level, but have failed to include this as part of the SEA, or in the cumulative effects.
- What kinds of studies have been done to evaluate the cumulative impact of flooding on the surrounding neighborhood from raising 71 acres in lower Mid-City as much as 3 feet above (and possibly up to 5.86 feet) existing grade.
- What are some of the additional features that will be implemented on the UMC side to reduce impacts?

RESPONSE

The UMC will be partially elevated in a manner similar to the VAMC. Elevations over a large proportion of both sites will remain at grade. The first floor of all UMC medical buildings will be at 3 feet above msl, section 4.2 has been modified to include this information. Other areas will slope gently upward to this elevation. Several additional design measures have been adopted which will reduce runoff into both the adjacent neighborhoods and the city drainage system on both medical campuses. These measures are discussed in sections 3.3 and 4.2 of the SEA. The UMC will likely also make use of some of these features, such as bioswales and catch basins.

COMMENT

We have seen maps of the proposed "Biomedical Corridor" that extends further into the Mid-City district. Are we to assume that as each area is seized and developed for this "corridor", the elevation will be raised to 1.33 ft above msl also? What is that impact?

RESPONSE

VA has no control over other new development in the area. The New Orleans Biomedical District is an economic development plan designed to encourage biomedical industry in this specific region of New Orleans. There are no specific construction plans associated with this district. It is not anticipated that areas will be 'seized' for any purpose, rather, businesses will be given incentives to pursue new development in this area. As these incentives are designed for private businesses, it is unlikely that any property could be appropriated by the state or the city. Any new construction in New Orleans must meet the current building codes, which means that new structures must be built above the BFE. Although this could mean that new buildings would need to be elevated, it does not mean that it would be necessary to use fill of any kind. Additionally, new development would be required to ensure that the new structures would not impact the existing drainage system.

COMMENTS

- How many cars cumulatively will be added to the area? What is the total impact on the surrounding neighborhoods?
- Is the information about both sets of traffic in this document?
- The City's Master Plan calls for the study of removing the I-10 elevated Claiborne Avenue Expressway. How will the closure of these streets and the loss of the grid pattern affect plan and the surrounding neighborhoods?
- Additionally, the Draft SEA fails to address the direct and indirect impacts of increased traffic on the entire Mid-City Historic District (Draft SEA page 3-56 through 3-60). The cumulative impacts section states that there will be a 40% net increase in traffic associated with the new VA and LSU hospitals, the Louisiana Cancer Research Center, and the New Orleans Bio-Innovation Center (Draft SEA page 4-17). Yet the Draft SEA fails to discuss how this increase in traffic will impact the Mid-City Historic District.

RESPONSE

VA has included several traffic analyses in the SEA, two of which incorporate cumulative impacts from the VAMC, the UMC, the Louisiana Cancer Research Consortium, the New Orleans Bio-Innovation Center and the new residential developments in the Tulane corridor. Sections 3.5 and 4.4 of the SEA have been updated to include more information from the traffic impact studies. The traffic impact studies that were conducted for the replacement VAMC and UMC conclude that the existing arterial streets have the capacity to handle the additional traffic. Impacts to the smaller side streets throughout the Mid-City Historic District are not anticipated as discussed in sections A-2.5 and A-2.9 of this appendix. Although the City's master plan calls for a study regarding the removal of the elevated I-10 along Claiborne Avenue, this has not been initiated yet. These studies by the City must be at least partially complete prior to being analyzed for their impacts to the VAMC and surrounding area. VA can only analyze projects that are reasonably foreseeable in the near future, and for which there is a suitable amount of information.

COMMENT

The sprawl nature of the medical district - and the sheer distance to the VA from other medical facilities, such as the Tulane hospital, requires transportation assistance. Will there be a dedicated shuttle service for the medical districts? Is the VA working with other agencies on developing a shuttle plan for the area? Is shuttle service considered in this study?

RESPONSE

VA will continue the VetTran system to transport patients to appointments at the other VA clinics. It is possible that this system would be used to transport patients to appointments at affiliate institutions should that need be present in the future. VA is not currently aware of plans for a joint medical center shuttle.

COMMENT

The dramatic five-fold increase in hazardous waste production from the VA hospital alone, and the unanswered questions regarding transportation and disposal of that waste, are discussed above.

RESPONSE

The waste sections in the SEA (3.4 and 4.3) have been expanded to incorporate additional information on the impacts to wastes in the area with respect to the VAMC, the UMC and other new developments in the area. Additionally, responses to comments on the waste section are found in section A-2.4 of this appendix.

COMMENTS

- When will the effects of the other facilities be taken into account in conjunction with VAMC?
- As discussed above, there is no justification for failing to complete crucial air quality studies. Analysis of these impacts is being unlawfully deferred and concealed from the public. Moreover, the eventual results of the incomplete air

quality studies could require changes in the design of the Central Energy Plant that would exacerbate its adverse visual impacts.

RESPONSE

VA has discussed the cumulative impacts to air quality in section 4.5 of the SEA. The air quality analyses have been completed and are discussed in section 3.6 of the SEA and detailed calculations can be found in Appendix E.

COMMENT

The traffic volume increases along the major access roads off site and the resulting traffic noises increases were calculated by comparing the estimated future traffic conditions to the existing baseline conditions. Assuming the traffic increase of 40% is accurate, these estimations for the traffic noise increases do not take into account the increased traffic noise from the proposed UMC, LSU Health Science Center, and other surrounding facilities. This is an incomplete analysis. When will a complete analysis be available?

RESPONSE

Both the traffic analysis performed by the VAMC and UMC incorporated additions to traffic from the VAMC, the UMC and the Louisiana Cancer Research Consortium and the New Orleans Bio-Innovation Center. The UMC analysis also included the residential developments in the area. These analyses were used to calculate noise impacts to the area in section 3.7 of the SEA. Therefore the general traffic noise analysis is a complete analysis which includes all these sources of additional traffic noise.

COMMENT

The discussion of cumulative noise impacts reveals that adverse impacts from construction noise will be much more severe than those disclosed earlier. The cumulative impacts chapter of the Draft SEA states that pile driving during construction will generate noise levels of up to 101 dB (Draft SEA page 4-20). By contrast, the earlier chapter on noise impacts states that “the worst case noise level predicted is below the acceptable 90-dBA construction noise criterion,” (Draft SEA page 3-79). Since 101 dBA is more than double the perceived noise level of 90 dBA—and would also violate noise regulations—this is no minor discrepancy.

RESPONSE

As discussed above, pile driving is an intermittent process that creates short bursts of noise only at the moment of impact. While the noise generated by pile driving activities certainly contributes to a higher noise environment, the noise burst is a very short duration and is at its peak level only at the location of the pile driver. Noise attenuates slowly over distance. The estimated hourly Leq in a range of 75 to 85 dBA is calculated by factoring in the pile driver noise, the other operating construction equipment and the separation distance between the pile driver and the sensitive receptors as discussed in Appendix F. VA acknowledges that construction activities will create higher than average noise levels over a short period of time. These noise levels are in accordance with the construction noise that is occurring throughout the city at other construction sites. The expected noise levels are below the FTA noise criteria standards as discussed in Section 3.7. Additionally, VA’s construction contractors would operate within the city

noise ordinances that require construction to occur between the hours of 7 am and 6 pm in conjunction with the use of mufflers on construction equipment. VA maintains that implementation of these steps will result in the minimization of any potential adverse impacts to the ambient noise environment as a result of construction activities for the replacement VAMC.

COMMENT

More outrageous, however, is the statement that noise levels of 101 dBA would represent “increased noise levels of approximately 10 to 12 dBA” above current noise levels (Draft SEA page 4-20). Since the Draft SEA admits that existing noise levels were never actually measured within the VA footprint (Draft SEA page 3-77)—there is absolutely no basis for the implicit assumption that current ambient noise levels are 89-91 dBA (101 minus 10 to 12). In fact, the existing ambient noise data for the adjacent UMC site (Figure 3-21), together with the admission that average noise levels for the VA site are estimated to be quieter than the average noise levels for the UMC site (Draft SEA page 3-77), suggests that the more likely estimate of existing ambient noise levels within the VA footprint would be 56.7 to 64.9 dBA (the blue colors on the map in Figure 3-21). Using a midpoint of 60 dBA, construction noise levels of 90 to 100 dBA would represent an increase of 30 to 40 dBA. Since noise measurements are logarithmic, and every ten decibels represents a doubling of perceived noise levels, this would represent noise level increases of 800 percent to 1,600 percent! The Draft SEA attempts to sweep these shocking impacts under the rug by failing to study and disclose the actual existing noise levels in the Lower Mid-City neighborhood.

RESPONSE

As discussed above, estimated noise levels for the VAMC site were adjusted to range from 57 dBA in the interior to 72 dBA along the major roadways. Though isolated locations along Canal Street and Tulane Avenue on the UMC perimeter spike above 74 dBA, to be conservative, the lower limit is used to determine overall ambient noise levels on the VAMC site. As the noise evaluation in Appendix F demonstrates, the overall predicted impact pile driving noise contributions at sensitive receptors immediately adjacent to VAMC show hourly Leq in a range of 75 to 85 dBA among all driving scenarios. This is below the acceptable 90-dBA construction noise criterion applicable to residential land use during daytime hours (7 a.m. to 10 p.m.) established by FTA. These construction noise levels would be exempt from the city noise ordinance between the hours of 7 am and 6 pm, per Ordinance No. 23129. VA would require impact pile driving activities to be restricted to the daytime hours. Additionally, the pile driving noise would be short-term and intermittent, therefore, VA maintains that there would be minimal impacts to the surrounding area related to construction noise.

COMMENTS

- This overall hospital development in this area is going to hem in St. Joseph Church and result in demolishing of the Deutsches Haus and what appears to be a culturally significant church at Gravier and South Galvez Streets.
- The first page of the chapter also repeats the erroneous and unlawful conclusion of the PEA—that significant adverse impacts on historic properties and

environmental justice will be reduced to an insignificant level (Draft SEA page 4-1). As discussed above, the Draft SEA casts even more doubt on that conclusion than the PEA itself, by failing to identify even a single historic property that will be saved by the vaunted relocation program, which was billed as saving and relocating 20 historic homes.

RESPONSE

The new developments in the area would have some impacts to St. Joseph Church and would result in the demolition of the Deutsches Haus on the UMC site. These impacts were analyzed in the PEA. No demolition in relation to either the replacement VAMC or the UMC would occur on Gravier Street; no churches are located on either the VAMC or the UMC sites. Potential impacts to St. Joseph Church, the Deutsches Haus, and the surrounding area have been minimized through design of the medical facilities and through agreements reached in the PA. Analyses that were completed in the PEA are not repeated in the SEA. These documents are available on the replacement VAMC website for more specific information. As discussed in section 2.9.4 of this appendix, to protect the rights of individual homeowners, no specifics on the house-moving program can be presented at this time.

UMC Connection Comments

Approximately 2.3% of comments related to physical connections and/or synergy with the proposed adjacent UMC facility. These comments are summarized below.

COMMENTS

- What buildings as shown here will be shared with the UMC?
- There are no walkways connecting the two hospitals (VAMC and UMC). Connections between the two facilities have been touted for several meetings.
- Questions separating the analysis for the proposed UMC and VA complexes in this process. Separation does not allow for adequate information on the projects as a whole. Outside of this process, the projects are being linked together and touted as the basis for the biomedical district.
- It is discouraging that the option of a combined shared CEP is still just in the discussion phase.
- The discussion of the potential for a combined energy plant with the LSU hospital (SEA at 2-22) just confirms what has been obvious for a long time—that the supposed “synergy” and efficiencies between the VA and LSU hospitals are a “bait and switch” tactic—an illusory charade.
- Figure 3-4 fails to illustrate or demonstrate any “synergy” with the LSU hospital. (Draft SEA page 3-19).

- We also reiterate our concerns about the failure to propose any shared parking structures with the proposed UMC facility, again revealing the charade of the professed “synergy” and shared facilities between the two hospitals.

RESPONSE

As is did before Hurricane Katrina, VA will continue its partnership affiliation for sharing personnel (doctors, nurses, interns, etc.) and services (for example radiation/oncology) with all medical affiliates in the area, including the UMC, and LSU, Tulane, Xavier, and Dillard universities. VA and the partner institutions have a rich history of shared services in this regard and VA looks forward to the opportunity to continue these relationships on the replacement VAMC campus. Co-location of the VAMC and UMC facilities will maximize the potential for such shared services. The details regarding shared services have not yet been finalized; however, the outcome of such discussions would not materially affect the design or placement of the majority of the buildings on the replacement VAMC campus.

VA and the State continue to investigate the potential for a shared CEP, however, as discussed in Section 2.3.5.1, such a shared building would be located on the UMC campus and the VA would retain a CEP/Warehouse with only minor building footprint modifications on the VAMC campus. A number of factors must be considered before a final decision regarding the possibilities of a shared CEP can be made.

The design teams for both the replacement VAMC and UMC have remained in contact throughout the design process to best facilitate connections and design synergy between the two campuses. This can be seen in the mirrored main entrance for the two facilities, the distribution of the largest buildings along the shared South Galvez Street perimeter, and the consideration of an optional connecting pedestrian bridge, either now, or at some point in the future.

Support for Hospital

Approximately 7.0% of comments expressed support for the VAMC project. These comments are summarized below.

COMMENT SUMMARY

These comments included general support for the project based on both the opportunities this project will present for the city and the community. Some comments stressed the advantages of the project including potential industry and job growth. The opportunity to revitalize the neighborhood, the Pan-Am Building, and the Dixie Brewery were emphasized in other comments. Advantages to the community of having a medical center nearby were cited including: access to early repairs for infrastructure systems due to the need to maintain supply to the medical facilities; increases in local property values; increases in local redevelopment. Other comments indicated satisfaction with the environmental review process including the quality of work, the number of public meetings, and the content material presented in the Draft SEA.

RESPONSE

VA appreciates the support expressed in these comments and looks forward to contributing to the ongoing recovery of the City of New Orleans during the construction and operations of the replacement VAMC.

Veterans Interests / Project Urgency

Approximately 5.3% of comments focused on veterans' interests and expressed the urgent need to complete the VAMC project as soon as possible. These comments are summarized below.

COMMENT SUMMARY

A number of comments were received stressing the urgent need for restored healthcare for area veterans. These comments stressed that while veterans have been very patient, they have been experiencing continued healthcare issues that are not able to be adequately addressed by the current system. The need to complete the project as soon as possible was emphasized given the time required to construct the facility and the time that has already passed since the existing VAMC was closed following Hurricane Katrina.

RESPONSE

VA appreciates and shares the urgent pleas to complete the replacement VAMC as soon as possible for the benefit of our veterans. VA is working as quickly as possible on all phases of project development and hopes to begin ground breaking within 2010 and bring the medical center to full operations by 2014.

Miscellaneous

Approximately 4.7% of comments were received on a number of issues that are not addressed in any of the other categories included in this appendix. These comments are summarized below.

COMMENTS

- Schedule and timing for the deadlines for replies to a significant document in this process are inadequate. Beginning of Mardi Gras and Saints Super Bowl victory made it difficult for people to focus on this document. Urge you to consider a brief extension of time, 10 days to 2 weeks to allow more people to be able to respond.
- The traffic studies require additional inquiry yet sufficient time and information has not been afforded for this to take place.

- Concerned that the public comment period for the Draft SEA has not been adequate. The document was released just three business days before the public hearing on January 19, leaving members of the public little time to digest the document and the complex technical issues it raises beforehand.
- For the National Trust, the comment period has been eclipsed by preparation for a major hearing in the litigation, travel to and from New Orleans, and two blizzards that delayed travel and shut down federal offices for more than four days. In our view, additional time should be allowed for the submission of written comments.

RESPONSE

VA recognizes the importance of these events for the City of New Orleans. However, these events were reasonably foreseeable and VA published the Draft SEA and announced the 30-day comment period with sufficient time and notice so that the public could comment on the document while enjoying these events. The Draft SEA was published on January 13, six days before the public meeting. It was not VA's intention for everyone to have read and analyzed the entire document before the public meeting. The purpose of the meeting was to present the findings of the Draft SEA and invite public comments while providing an opportunity to ask questions that would assist in the review of the document. VA believes sufficient time was presented for interested parties to review and comment on the Draft SEA. While the public comment period closed on February 12, VA received comments after this date and has made an effort to consider and incorporate as appropriate all comments received.

COMMENTS

- There have been shifting acronyms over the course of this process, on what website will the information from this meeting be available?
- Since VA is still using the [valsumedcenters.com](http://www.valsumedcenters.com) website, it means you are still incorporating LSU into your process?
- Is the Regional Planning Commission website NOLA Medzone an official website for the project?

RESPONSE

During the Tier I process, the state medical center was referred to as the Louisiana State University Academic Medical Center (LSU AMC). Following approval of the governing plan, the name of the state facility was officially changed to the University Medical Center (UMC). The public website for the project was originally established as <http://www.valsumedcenters.com>. To avoid confusion VA has elected to maintain this website address for the ongoing Tier II process. Information related to the Tier II process for the UMC is available at <http://www.lsuamc.com>. A link to the UMC website and to all Tier I materials associated with both medical centers is available on <http://www.valsumedcenters.com>. The City of New Orleans has established the NOLA MedZone website at <http://demoweb.gcr1.com/nolamedzone/index.cfm> to provide information related to the City perspective with respect to both the replacement VAMC and UMC websites. Official information from the VA regarding the replacement VAMC will be posted on the <http://www.valsumedcenters.com> website.

COMMENT

What function does the hospital perform compared to the existing facility? What is the bed space compared to the existing facility? Are there functions performed by the new facility that were not performed at the existing facility?

RESPONSE

The replacement VAMC will perform the same functions and have essentially the same number of beds (approximately 200) as the former VAMC with larger research capabilities.

COMMENT

What is the relocation plan? How many houses will be saved? Who is eligible? When will information be available?

RESPONSE

The relocation plan is being handled by the State of Louisiana in accordance with the Uniform Relocation Act. Residents requiring information about the process are encouraged to contact Volkert & Associates, 3466 Drusilla Lane, Suite A, Baton Rouge, LA 70809, 1-800-340-1070 (Ask for the "Real Estate Services Department"). The house moving grant is being developed and implemented by the Louisiana SHPO's office. Eligible homes are single story structures that are contributing elements to the Mid-City NRHD. VA and the City will support SHPO by reimbursing up to \$600,000 and \$200,000 respectively for the cost of the house moving program. Information on the homes moved will be available after the process is complete to protect homeowners privacy.

COMMENT

Agree that Alternative #4 is less harmful than the other design alternatives, because Alternative #4 reflects modifications that were incorporated in response to criticism from the consulting parties. Those critical comments on the design were submitted both through the NEPA process (e.g., April 16, 2009 public meeting), and through the Section 106 design review comment process mandated by the Programmatic Agreement (PA).

RESPONSE

Alternative # 4 was developed through incorporation of comments from not only VA and the design team, but also from veterans, the general public, preservation organizations, the business community, other interested stakeholders. Alternative # 4 is the preferred alternative because it is the most responsive to comments and VA believes it would have the fewest potential impacts on the surrounding community and the City of New Orleans.

COMMENT

Table 2-1 summarizing the impacts misrepresents and understates a number of the different types of adverse impacts.

RESPONSE

Table 2-1 has been reviewed and updated for the final SEA.

COMMENT

The SEA assumes, based on the PEA, that 331 residents will be displaced from the VA site, (it is surprising that the “actual number of residents on the site is not available,” SEA at 3-3, considering that acquisition of properties and forcible expropriation and relocation have already begun.) but concludes that, “given the small number of residents on the site in comparison with the total population of the City of New Orleans, the potential impacts to population would be minor.” SEA at 3-3. The total population of New Orleans is not the appropriate denominator by which to measure the impact of this project on a “community of concern” for purposes of environmental justice analysis. The Lower Mid-City neighborhood is defined as a community of concern because its residents are predominantly racial and ethnic minorities (88.2% minority population within the VA site), with very modest incomes (43.6% earning less than \$15,000/year). PEA at 3-82 (Table 3-8). The implication of the VA’s conclusion is that these 331 residents don’t matter, that they are dispensable. We strongly disagree. The whole point of environmental justice analysis is that communities such as the Lower Mid-City neighborhood have for too long been treated as dispensable, and their communities have become the target or the dumping ground for undesirable projects. Those adverse impacts are not cured by breaking up the community and dispersing the residents to a variety of other locations, even if some of their costs are reimbursed.

RESPONSE

Impacts of site selection and site preparation, including the relocation of all residents on the site, were thoroughly evaluated in the PEA. VA does not believe and has never stated that any residents or communities currently on the project site or in the surrounding area are dispensable. VA believes that the treatment measures agreed to in the PA and as described in the PEA establish appropriate mitigation for any potential impacts to these residents. Information is not currently available regarding the actual number of residents present on the site because the appraisal and assessment process is still underway.

COMMENTS

- In addition to the inherent flaws in the process as a whole, the Draft SEA itself has numerous inadequacies, described in more detail above, which must be corrected before any further action is taken. In particular, the Draft SEA fails to disclose accurate and complete information about the full nature and magnitude of the impacts of the proposed VA hospital, especially within the surrounding Mid-City Historic District.
- Urge the VA to correct the multiple, fundamental deficiencies in this NEPA document, which also serve to highlight the inadequacies and unlawful scope of the earlier Tier I NEPA document. Failure to complete these analyses and fully disclose these impacts prior to making a final decision will leave the VA vulnerable to another legal challenge.

RESPONSE

Comments received during the public comment period have been reviewed and incorporated as appropriate into the SEA. Clarifying descriptions and additional information has been included in the SEA in various sections of the main document, and

in supporting appendices at the end. VA believes this SEA thoroughly and completely evaluates the potential environmental impacts associated with the construction and operations of the replacement VAMC.

PEA/Site Selection/City Planning/Hearings

Approximately 17.6% of the comments received on the Draft SEA related to the PEA, the site selection process, and the requests for public hearings from the City of New Orleans.

COMMENT SUMMARY

A number of comments were received protesting the site selection. Comments indicated that proper procedures were not followed by the City when the site was offered to VA. Other comments stressed that one of the other site alternatives should be chosen, and additional alternatives of placing the VAMC on the UMC site and the UMC back in Charity Hospital, or combining the VAMC and UMC on the UMC site were offered. The use of federal dollars first in grants for some homeowners to restore their homes and now for demolition of those same structures was seen as wasteful. It was suggested that similar economic benefits to the city would result if any other site was chosen and that impacts to the population would not be minor due to the number of homes demolished.

Some comments disagreement with the findings of the PEA or the FONSI documents. The lack of any shared facilities was seen as contradicting the tired environmental review process as well as site selection.

RESPONSE

VA can only evaluate viable alternatives. As stated in Section 2.1 of the PEA, in April 2007, VA issued a request for expressions of interest for the acquisition of land for the construction of a new medical center in New Orleans. Three offers were received in response to VA's advertisement, including the Ochsner site and the Regional Planning Commission's (RPC's) Tulane/Gravier site. A third site was considered ineligible because the property was only 2 acres in size and did not meet the size requirements specified in VA's advertisement. On 25 August 2008, Victory Real Estate Investments, LLC (VREI) offered another site (Lindy Boggs) to VA for site selection consideration. Although other potential site locations have been mentioned by the public, no other viable offers were submitted to VA for consideration. Therefore, no other alternative site locations for the VAMC were able to be considered for the site selection evaluation in the PEA. At no point in the process has the proposed UMC site been offered to VA as a potential site location. Because the site selection analysis was completed during the Tier I process which resulted in the PEA, site selection was not a factor for discussion in the SEA.

EIS/Tiering

Approximately 5.9% of comments expressed the opinion that the environmental review process should have resulted in an EIS and that the tiering approach was inappropriate. These comments are summarized below.

COMMENT SUMMARY

A number of comments asserted that the tiering process is inadequate and illegal and that an EIS should be performed evaluating both medical centers from site selection through design. Because the VA's initial, conceptual designs were released less than one month after the FONSI was signed, and because the impacts are virtually identical for the various design alternatives, there was no legitimate reason to delay this evaluation to a later tier. Information revealed in the Draft SEA, such as the need for extensive infrastructure changes, demonstrates that that adverse impacts will be greater than were presented in the PEA and calls into question the tiering process and analyses. The tiered approach to Section 106 is deeply flawed, and has been legally challenged by the National Trust. It is highly questionable if the Section 106 process was in compliance on many levels.

RESPONSE

VA's decision to tier its NEPA analysis as well as other aspects of VA's NEPA compliance was challenged legally. On March 31, 2010, the United States District Court for the Eastern District of Louisiana ruled that tiering a more narrowly tailored EA to a previous, broader NEPA review of agency action is warranted under the law for cases such as this where large-scale federal programs involve a multiplicity of individual actions. The Court also noted that by tiering the NEPA analysis, the agencies [VA and FEMA] were able to devote more time to investigating the facts before them and conducting a more detailed analysis, than if they were required to analyze the entire project at once despite lacking crucial information. VA's compliance with Section 106 of the National Historic Preservation Act has not been challenged legally; however, VA believes that the comprehensive consultation process and resulting PA demonstrates full compliance with Section 106.

CEA/MOU

Approximately 1.2% of the comments applied to the interagency agreements: the MOU between VA and the City of New Orleans (Appendix B) and the CEA between the City and the State of Louisiana. These comments are summarized below.

COMMENT SUMMARY

Comments related to the MOU and the CEA focused on current status of and nature of changes to these documents.

RESPONSE

Both the CEA between the State of Louisiana and the City of New Orleans and the MOU between VA and the City of New Orleans have been revised and amended based on new information related to the acquisition of property, site preparation, construction, and operations of the replacement VAMC and UMC. The MOU is available in Appendix B of this SEA.