

**APPENDIX A**

**Public Comment and Responses Summary**

## **Public Comments**

### **Environmental Scoping for the Reestablishment of the VAMC and LSU AMC**

Public comments were received during several public meetings held from June through August of 2008 in the greater New Orleans area. 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 Programmatic Environmental Assessment (PEA). Public involvement in development of this PEA is discussed in Section 1.3.1 of the PEA.

---

#### **Need for health care in New Orleans**

Approximately 17% of comments express the need for health care in New Orleans, specifically for veterans. The comments are summarized below:

- Current health care facilities are operating at well below pre-Katrina levels. Health care services for citizens/veterans need to be restored to pre-Katrina conditions as quickly as possible. Therefore, choose a site that creates the least controversy. Choose to build around the historic properties, preserve the historic properties, or integrate those historic properties into the hospital.
- Temporary U.S. Department of Veterans Affairs (VA) facilities require veterans to travel to out-of-state facilities for medical services. Such travel results in a delay in treatment and financial hardship.
- VA hospitals should be built in close proximity to medical schools to provide veterans with the best medical care available.
- The current VA facilities are not sufficient to respond to the needs of the current veterans or those returning from Iraq and other active assignments.
- Current VA facilities in New Orleans are under-staffed and the care givers are over worked.
- The issue of economic development and possible benefits for the City are overshadowing what should be the VA's first priority: restoring quality healthcare to veterans as quickly as possible.

**RESPONSE:** Revitalization of the healthcare infrastructure in New Orleans is vital to the City, its residents, veterans, and the entire Gulf Coast region. Therefore, the VA and the Federal Emergency Management Agency (FEMA) in addition to the State of Louisiana (State) as the applicant of FEMA funds and as the grantee and the City of New Orleans (City) as the sub-grantee of the Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) funds, are conducting this PEA to assist in the site selection process for new medical facilities for the State and VA. Reestablishing centralized and comprehensive care is the principal goal for full recovery of health care in New Orleans, and thus a motivating factor for the Proposed Action. The purpose and need for the Proposed Action is detailed in Section 1.1 of the PEA.

The scope of this PEA is to: identify, evaluate, discuss, and analyze the current and projected impacts of the Proposed Action, and also the alternatives to these activities, on the environmental, historic, social, and economic resources of the study area. Section 106 of the National Historic Preservation Act (NHPA; 16 United States Code 470) requires Federal agencies to take into account the effects of their undertakings on historic properties (Title 36 Code of Federal Regulations [CFR] 60), and to afford the Advisory Council on Historic Preservation (ACHP) an opportunity to comment. See Chapter 2 of the PEA for an evaluation of alternatives. The impact to cultural resources is evaluated in Sections 3.5 and 4.3.

---

### **Historical Preservation**

Approximately 14% of comments are related to preservation of historical homes and properties. More specifically, these comments support selecting an alternative or site that doesn't impact historic and archeological properties, or building around and preserving existing historic properties, such as Deutsches Haus, Dixie Brewery, McDonough #11 School, and the St. Louis Cemetery #2.

**RESPONSE:** The scope of this PEA is to: identify, evaluate, discuss, and analyze the current and projected impacts of the Proposed Action, and also the alternatives to these activities, on the environmental, historic, social, and economic resources of the study area. Section 106 of the NHPA (16 United States Code 470) requires Federal agencies to take into account the effects of their undertakings on historic properties (36 CFR 60), and to afford the ACHP an opportunity to comment. See Chapter 2 of the PEA for an evaluation of alternatives. The impact to cultural resources is evaluated in Sections 3.5 and 4.3.

---

### **Lack of public involvement in site selection**

Approximately 11% of comments are related to a lack of public involvement in the site selection process. Specifically, numerous comments are in reference to the lack of public involvement in the City of New Orleans' recommendation and decision making processes. Additional comments are summarized below:

- The public has not been informed of the site selection criteria.
- Has a site already been selected and has design of the facility been initiated?
- Incorrect project information is being presented at meetings.
- Information available to the public has not been updated since the Lindy Boggs site was officially added as an alternative.

**RESPONSE:** Public notice and public input are required on any project funded by FEMA or other federal agencies in accordance with the National Environmental Policy Act (NEPA) and Section 106 of the NHPA. Details of the public involvement in preparation of this PEA are provided in Section 1.3.1. Additionally, a website has been

established at [www.valsumedcenters.com](http://www.valsumedcenters.com). This website is periodically updated to provide the latest project news, schedule information, available documents, and public meeting announcements.

The site(s) selected for development needs to meet a number of criteria in order to achieve the purpose and need of the project. Four main criteria were used for site evaluation: proximity to the Louisiana State University (LSU) Health Sciences along Tulane Avenue and other related health education providers; access from I-10 and local collector streets; area and geometry of site; and adequate growth and expansion potential. The specific criteria used for site selection development are presented below:

- Provide sufficient acreage to construct new facilities to meet current and future capacity needs (a minimum of 25 acres for the Veterans Affairs Medical Center [VAMC] facility and a minimum of 40 acres for the LSU Academic Medical Center [AMC] facility);
- Allow for reestablishment of a major trauma center, including ease of access to interstate highways, other major thoroughfares, and public transportation;
- Meet current Federal requirements, including standoff distance, hurricane hardening, and storage of fuel, food, and water for self-sufficient operations;
- Conform to the State and City plans for the post-Katrina revitalization of the City;
- Allow for operational synergies and possibly integration with other major healthcare facilities, LSU and Tulane medical schools, and bio-medical research facilities by locating the proposed facilities in close proximity to existing facilities, recognizing the continued roles of those existing facilities as part of the overall healthcare delivery and medical training mission;
- Accommodate individual hospital operations efficiently within one contiguous area and for LSU AMC hospital, under one roof;
- Allow for affordable and convenient as well as an appropriate mix of housing for the workforce near the project site(s); and
- Allow for sufficient visibility to the public.

No decision has been made as to final site selection nor has a footprint or design for any new facilities been finalized. A designer has been retained and the VA is in the pre-schematic phase. The pre-schematic phase includes defining space requirements and things necessary to go into the schematic design phase. That won't happen until a site has been selected. The pre-schematic decisions will be applicable regardless of what site is selected.

### **Support for the Mid-City Location**

Approximately 17% of the comments are in support of the Mid-City location. The comments are summarized below:

- The Mid-City location is in a transportation hub with existing bus service making it easily accessible, especially for older veterans that may not be able to drive or have family to assist them.
- It is in close proximity to two teaching hospitals.
- Locating the VA hospital in the medical corridor will be an incentive for doctors to come to New Orleans to train and care for veterans.
- Keeping the Medical Center of Louisiana at New Orleans (MCLNO) regional and the VA medical center downtown will improve the quality of life and improve or positively impact the downtown historic areas; provide access to leading edge healthcare for everyone; help LSU, Tulane, Xavier, and Delgado train health care professionals for New Orleans and greater New Orleans, as well as the state; provide thousands of high quality jobs in an area that greatly needs them; and will help anchor a bio-science industry downtown.
- The Greater New Orleans Biosciences Economic Development District (GNOBEDD) has passed a resolution that the Mid-City location is the correct location.
- The Downtown Development District board of administrators “believes that the new facilities adjacent to downtown are the best solution.”
- The New Orleans Regional Planning Commission gives its full support and unanimous consent to do this project in downtown New Orleans.

**RESPONSE:** The scope of this PEA is to: identify, evaluate, discuss, and analyze the current and projected impacts of the Proposed Action, and also the alternatives to these activities, on the environmental, historic, social, and economic resources of the study area. See Chapter 2 of the PEA for an evaluation of alternatives. The Proposed Action, relocating to the Tulane/Gravier area, is described in section 2.2.2. The impact to socioeconomics is evaluated in Sections 3.6 and 4.4.

### **Opposition to the Mid-City Location**

Approximately 13% of the comments are in opposition to the Mid-City location. The comments are summarized below:

- The State and the VA should look at other alternatives that don't require displacing residents and don't impact a significant number of historical homes and properties, specifically Deutsches Haus, Dixie Brewery, McDonough #11 School, and the St. Louis Cemetery #2. .
- Current U.S. Census Bureau statistics do not reflect the pre-Hurricane Katrina demographics of the area or changes to the area since re-population has begun.
- The National Trust for Historic Preservation named the Mid-City neighborhood one of the 11 Most Endangered Historic Sites in the U.S.

- Residents and business and property owners were encouraged by the City and elected officials to rebuild after Katrina only now to face the possibility of losing their homes or businesses to this project.

**RESPONSE:** The scope of this PEA is to: identify, evaluate, discuss, and analyze the current and projected impacts of the Proposed Action, and also the alternatives to these activities, on the environmental, historic, social, and economic resources of the study area. Section 106 of the NHPA (16 United States Code 470) requires Federal agencies to take into account the effects of their undertakings on historic properties (36 CFR 60), and to afford the ACHP an opportunity to comment. See Chapter 2 of the PEA for an evaluation of alternatives. The proposed action, relocating to the Tulane/Gravier area, is described in Section 2.2.2. The impact to cultural resources is evaluated in Sections 3.5 and 4.3.

A detailed discussion of Environmental Justice-related existing conditions and impacts from the proposed action and its alternatives can be found in Section 3.6.3 of the PEA. The availability and use of accurate, up-to-date demographic population and housing statistics is addressed in Section 3.6.1 of Socioeconomics. Block level data available from the 2000 Census are no longer representative of conditions in the areas of concern due to the dramatic changes in population and housing that have occurred in the New Orleans metropolitan area in the wake of Hurricane Katrina, especially within Orleans Parish. In order to provide information that is both representative of current conditions and on a small enough scale to address specific sites, population and housing estimates for 2008 were obtained from the ESRI Business Analyst demographic database (ESRI 2008). These data updates include estimates of the demographic and economic effects of Hurricanes Katrina, Rita, and Wilma along the Gulf Coast. Impacts were estimated by examining new sources of information obtained from disaster response agencies, news reports, and fieldwork.

---

### **Support for the Lindy Boggs Location**

Approximately 13% of the comments are in support of the Lindy Boggs Location. These comments are summarized below:

- No residential relocation or impact on historical buildings will occur.
- The Lindy Boggs location is already zoned medical.
- Selecting the Lindy Boggs site will reduce the timeline for having a facility up and running.
- Shuttle service could be implemented between this location and the LSU AMC downtown

### **Opposition to the Lindy Boggs Location**

Approximately 1% of the comments are in opposition to the Lindy Boggs Location. These comments are summarized below:

- The Lindy Boggs location is not in close proximity to the medical schools .
- Transportation is not sufficient to support the needs of the hospital.
- Available land is insufficient to adequately support the required square footage.

**RESPONSE:** The scope of this PEA is to: identify, evaluate, discuss, and analyze the current and projected impacts of the Proposed Action, and also the alternatives to these activities, on the environmental, historic, social, and economic resources of the study area. A description of alternative #2, relocating the VAMC to the Lindy Boggs site, is provided in Section 2.2.3 of the PEA. Affected environment and environmental consequences of this and other alternatives are discussed in Chapter 3.

---

### **Support for Ochsner**

Approximately 1 % of the comments are in support of the Ochsner site. The comments are summarized below:

- Building at the Ochsner site will not require acquisition of private land. Therefore, selecting the Ochsner site will expedite the process.
- The Ochsner site is close to an interstate, not in a flood zone area, and could easily be evacuated if needed.
- A shuttle service could easily be implemented for transport between the site and the medical schools in downtown New Orleans.

### **Opposition to the Ochsner site**

Approximately 1 % of the comments are in opposition to the Ochsner site. The primary objection is that the Ochsner site is not in close proximity to the medical schools and other medical facilities located in downtown New Orleans.

**RESPONSE:** The scope of this PEA is to: identify, evaluate, discuss, and analyze the current and projected impacts of the Proposed Action, and also the alternatives to these activities, on the environmental, historic, social, and economic resources of the study area. A description of alternative # 3, relocating the VAMC to the Ochsner site, is provided in Section 2.2.4 of the PEA. Affected environment and environmental consequences of this and other alternatives are discussed in Chapter 3.

---

### **Issues related to the existing Charity Hospital**

Comments related to Charity Hospital account for approximately 6 % of the comments received. These comments are summarized below.

- Charity Hospital can and should be renovated and rebuilt as a state-of-the-art medical facility.

- The existing Charity Hospital should be renovated for use as dorms for medical students or apartments/condos that could possibly be used for visiting families of patients or senior citizens.
- The historic Charity Hospital building is a New Orleans icon which must be preserved.
- Will the independent study of Charity Hospital conducted under House Concurrent Resolution 89 by RMJM Hillier be considered in the PEA?
- The determination by the Office of Facilities that Charity Hospital is “outmoded” contradicts a report by Blich-Knevel that said the deficiencies are correctable.

**RESPONSE:** As part of the Proposed Action, the 23 buildings that comprise the existing MCLNO complex (including Charity Hospital) would be stabilized and evaluated for redevelopment, reuse, demolition, or as surplus by the State of Louisiana, with the intention of returning the properties to commercial use. However, these actions are not considered part of this alternative and they would be addressed through a separate NEPA and NHPA evaluation.

In the Blich Knevel Storm Damage Evaluation report for Charity Hospital published June 2, 2008, the following conclusion was made:

*This report is not intended to render any opinion for the preservation, reconfiguration, or replacement of Charity Hospital. This report provides an evaluation of disaster related damages resulting from Hurricanes Katrina and Rita, and the cost to return the original building to pre-storm functions as a fully accredited Level 1 Trauma Center and Teaching Hospital.*

The study conducted by RMJM Hillier for the Foundation of Historical Louisiana was published August 20, 2008. The results of this study will be evaluated as part of the site selection process.

---

### **Issues Related to Renovating Existing VAMC**

Approximately 3 % of the comments received were related to renovating the existing VA Medical Center facility, with the majority of comments specifically asking 1) if a study has been done of the existing structure or 2) suggesting the existing facility be renovated into mixed-use residential space.

**RESPONSE:** Modification/renovation of the existing New Orleans VAMC facility was considered but eliminated from further consideration. Hurricane Katrina caused extensive damage to the VAMC facility rendering the existing facility unacceptable for continued use as a medical facility. In addition, the limited acreage of the existing site would not provide sufficient acreage to construct new state-of-the-art facilities to meet or exceed the capacity of the existing facilities, would not provide additional land for future expansion, and would not provide sufficient acreage to meet current Federal requirements, e.g., standoff distances. Therefore, based on ongoing mold concerns,

current design requirements, size (acreage) constraints, costs, environmental hazards, and time consideration, modification/ renovation of the existing New Orleans VAMC facility was dismissed as not feasible. See Section 2.3.1 of the PEA for additional information.

---

### **Miscellaneous**

Approximately 3 % of the comments are related to issues that aren't addressed in the categories above. The comments are summarized below:

- Cumulative Impacts
  - The cumulative impacts of the individual VAMC and LSU AMC projects in conjunction with each other and with reasonably foreseeable future actions of other parties within the GNOBEDD must be considered.
  - Cumulative impacts resulting from the abandonment of the original VAMC and MCLNO sites must be addressed.
  - The cumulative socioeconomic impacts of the VAMC and LSU AMC hospital projects in conjunction with past federally funded projects that have occurred in the vicinity of each of the alternatives must be considered.

**RESPONSE:** Cumulative impacts are discussed in Chapter 4 of the PEA. Cumulative impacts specific to socioeconomic issues are discussed in Section 4.4.

- An Environmental Impact Assessment of the Proposed Action is requested.

**RESPONSE:** Although an Environmental Assessment (EA) or Environmental Impact Statement (EIS) may be required for an individual action by a Federal agency, where Federal programs involve a multiplicity of individual actions, the Council on Environmental Quality (CEQ) has endorsed the concept of performing a PEA. The CEQ recommends programmatic environmental reviews for assessing the environmental effects of individual actions on a given geographical area or the overall impact of a large-scale program or chain of contemplated projects. Because they are broad in nature, programmatic environmental reviews may cover basic policy issues so that these issues do not need to be repeated in subsequent EAs prepared for the individual actions within a program. Once the site selection is completed, a site-specific EA or EIS may be conducted focusing on the site specific issues. The scope of the PEA is discussed in more detail in Section 1.2 of the PEA.

- How was the list of sites to be considered developed? Why weren't other sites considered?

**RESPONSE:** The VA put out a solicitation request for interest in response to their intent to relocate the VAMC. The sites were developed based on the proposals received in response to that solicitation.

- When selecting a site(s) for new hospital facilities, the issue of public transit accessibility for veterans should be carefully considered.

**RESPONSE:** The existing conditions and impacts on transportation resources associated with the various alternatives are presented in Section 3.7 of the PEA. Available transit resources for disabled passengers are included in these discussions.

- Use of the existing facilities and satellite locations would be a more cost efficient alternative. The cost savings could be utilized by the VA for medical research, staff enhancement, recruitment, and better qualified personnel and quality services. Another option is viable that has not been considered: utilize the Lindy Boggs site and renovate Charity Hospital.

**RESPONSE:** Revitalization of the healthcare infrastructure in New Orleans is vital to the City, its residents, veterans, and the entire Gulf Coast region. Therefore, the VA and the Federal Emergency Management Agency (FEMA) in addition to the State of Louisiana (State) as the applicant of FEMA funds and as the grantee and the City of New Orleans (City) as the sub-grantee of the Department of Housing and Urban Development (HUD) Community Development Block Grant (CDBG) funds, are conducting this Programmatic Environmental Assessment (PEA) to assist in the site selection process for new medical facilities for the State and VA. Reestablishing centralized and comprehensive care is the principal goal for full recovery of health care in New Orleans, and thus a motivating factor for the Proposed Action. The purpose and need for the Proposed Action is detailed in Section 1.1 of the PEA.