

BY EMAIL TO: public.comments@earthtech.com

May 7, 2009

Bobbie Hurley
Earth Tech AECOM
1555 Poydras Street, Suite 1860
New Orleans, LA 70112

Re: Comments Regarding Design Alternatives for the Proposed Veterans Affairs
(VA) Medical Center in New Orleans

Dear Ms. Hurley:

The National Trust for Historic Preservation appreciates the opportunity to comment on the four design schemes for the proposed VA Medical Center in New Orleans presented on April 16, 2009.

Comments on Procedural Issues

- The National Trust and a number of other parties objected to the April 16 meeting date, because it was scheduled to occur at the same time as the Neighborhood District 1 master planning meeting. Surely the NEPA team must have realized that, while the proposed VA site is in District 4, the *existing* VA hospital is in District 1. What happens in the Central Business District is of interest to everyone in the city. It was short-sighted, and inconsiderate to members of the public, not to coordinate these meetings. The master planning meeting was scheduled with sufficient public notice many weeks in advance. By contrast, the notice for the VA meeting was only about a week and a half.
- In preparation for the meeting we printed out the four design schemes posted on the website (www.valusmedcenters.com) and prepared comments based on those designs. However, we discovered upon arriving at the meeting that the four schemes on the web site did not match the four schemes on display and on the distributed hand-outs. We appreciate the fact that designs can change, but it was prejudicial to the public that the designs posted on-line for comment were different from the alternatives under discussion at the NEPA scoping meeting. This was only one of the many challenges this particular meeting presented.
- Upon arriving at the meeting, we were distressed to learn that the format of the meeting had been altered from what was indicated in the public notice. The public notice stated:

The public meeting will begin with a 30 minute open house from 6:30-7:00 pm to allow interested parties to view the proposed design alternatives and talk directly to Federal representatives. At 7:00 pm VA will give a brief presentation, after which the audience will have an opportunity to voice questions and comments.

Contrary to the notice, the audience was *not* allowed the opportunity to voice its questions and comments. Instead, individuals could make private comments to a

court reporter at her station, or they could speak off the record to an architect stationed at one of the corners of the room, but *the audience* did not have the benefit of hearing other members of the public speaking and sharing their views about the design alternatives. Nor was there a complete record of this meeting. This tactic raised strong objections and suspicions among those who attended, and created a pervasive atmosphere of distrust, all of which could have been avoided if the VA had been willing to allow a genuine exchange of information and views from concerned members of the public. We question whether the bait-and-switch format of the April 16 meeting, which deprived the public of the ability to hear other comments, would satisfy the public hearing requirements of NEPA.¹

Comments Applicable to All Four Design Schemes

Relationship to Historic District/Neighborhood

- What happens on this site has ramifications for the immediate surroundings, and the wider region. There will be impacts upon streets, transportation, infrastructure, and surrounding land use. The City Planning Commission has been deprived of any role in developing or refining this plan. It cannot avoid having a role in guiding what happens outside of this footprint.
- We pointed out in our comments on the January 22 designs that we saw no relationship between these designs and the Mid-City National Register Historic District. Three months later, the plans still bear no relationship to the adjacent and surrounding historic district.
- This is intended as a secure campus, with only a handful of controlled access points. There is no relationship with the surrounding neighborhood.

Relationship to LSU Plan

- The National Trust was instrumental in encouraging the VA and LSU to rethink their approaches to the environmental and historic preservation reviews for their respective plans. We pointed out more than a year ago that it was a mistake to evaluate plans of this magnitude independently of one another. As a result, we were pleased to see that the review was re-initiated jointly.
- Now, all pretence of a relationship between these two facilities seems to have been abandoned. The VA presented its plans on April 16, and two weeks later LSU presented its separate, unrelated plans. There are no shared facilities, no

¹ “Public hearings provide the community and the decisionmakers a forum for the free and contemporaneous exchange of ideas. It is a dynamic process which has at its core the idea that it is only through a public meeting that details and intricacies of controversies can be best explored and understood.” *City of South Pasadena v. Slater*, 56 F. Supp. 2d 1106 (C.D. Cal. 1999) (concluding that plaintiffs, including National Trust, raised “serious questions “ about whether the format of an open house is equivalent to a public hearing).

economies of scale, and no synergy. Even the web-site is no longer shared. The VA's assertion in its March 13 response to comments that it continues to "explore opportunities" for shared facilities with LSU, such as a single energy plant, was contradicted by the fact that all of the LSU design alternatives presented on April 29 showed the central energy plant at the farthest possible location from the VA site, and contained no evidence of *any* shared facilities.

- Many of the comments in response to the January 22 designs emphasized the importance of reviewing both plans together. Instead, the review process has become even more segregated than before.
- The National Trust would also like the City Planning staff to weigh in on how these plans succeed or fail to work with one another and with the surrounding historic neighborhood.

Dixie Brewery and Pan American Building

- The National Trust would like to know the status of the feasibility study of the Dixie Brewery building. We were told in January that there was a problem with gaining access to the building.

Green Spaces/Landscaping

- The conflicting design strategies remain --the push for open space, but at the same time a desire for additional space on the site in which to expand. As expansion proceeds, green space is lost.

Massing and Bulk

- At the April 16 meeting, we were told that buildings would be set back 100 feet from S. Rocheblave in an effort to mitigate their impact on the residential neighborhood across the street. It is difficult to tell what the setbacks are from these diagrams, but the setback of the new structures seems to be the greatest in Scheme 4, the scheme which also uses a few historic houses from the neighborhood. The other schemes make no attempt to mitigate their impacts.

Use of Streets

- In every one of the schemes, Banks Street terminates at S. Rocheblave. Its current connection to S. Galvez would be completely lost. S. Rocheblave, a street of lower capacity than S. Galvez, must then carry that traffic, along with the staff, service and ambulance traffic entering the VA site.

Entry/Relationship to the Central Business District

- This medical center would be farthest from the Central Business District of all the hospitals. These designs have no relationship to the CBD, and little or no relationship to Canal Street or Tulane Avenue, two major through streets.

Public Transit/Transportation

- There is no indication that the plans attempt to recognize the needs of individuals arriving by public transportation, whether patients, staff, or visitors.

Parking

- Parking garages continue to be a dominant feature of the plans, and their proposed locations would exacerbate adverse impacts on the Mid-City Historic District. In all cases, traffic to access staff parking would be shunted to S. Rocheblave, the street with the least capacity for traffic. In every alternative except Scheme 4, a massive parking garage would butt right up against the remaining portion of the Historic District. This feature was strongly criticized in response to the January 22 plans.
- The VA's March 13 response to comments erroneously states that the proposed staff parking garage has been adjusted to place the short edge facing Rocheblave. On the contrary, only Scheme 4 includes this feature; all other schemes align the parking garage lengthwise along S. Rocheblave.

Expansion

- In response to the comments of the consulting parties on the VA's designs presented on January 22, VA indicated that there would be no expansion of the facility outside of the current footprint.
- The designs presented at this meeting do not show how the complex will be expanded to accommodate growth. Designs presented at the January 22 design review meeting had this feature.
- Meanwhile, even if the VA Medical Center itself does not jump the boundaries of this site, the indirect, secondary, and cumulative impacts on the surrounding historic district will be severe, as a result of the businesses that will inevitably follow the VA Medical Center into the heart of the Mid-City Historic District. The City Planning Commission must be involved to assure appropriate zoning for the surrounding neighborhood, to protect its historic residential character, and to discourage expansion of the medical center.

Setbacks

- Schemes 2, 3, and 4 all contained a statement on the hand-out under the category "Traffic, Access, and Circulation": "hardened walls separating below grade parking from occupied space replace the 50' security setback requirement." We have repeatedly been 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.

Comments Specific to Scheme 1

- The Scheme 1 diagram published on the web-site (www.valsumedcenters.com) right before the April 16 meeting showed the Staff Parking garage sited with the long side parallel to what would have been Banks Street. On the hand-out distributed at the April meeting the Staff Parking garage is sited with the long side along S. Rocheblave.

Comments Specific to Scheme 2

- On the hand-out distributed at the April 16 meeting, the fourth text block under "Site Response" says "Dixie Brewery expanded for CEP & Warehouse." The lower left "Campus Planning Diagram" indicates the Dixie Brewery and shows a parking lot to the left of the building. The lower right "Clinical Planning Diagram" labels the Dixie Brewery as "Research." We would like to know what is actually being proposed here.
- On the hand-out distributed at the April 16 meeting, the first text block under "Traffic, Access, and Circulation" states "Main entrance drive ramps up 20' to a drop off courtyard with two parking levels below." The Scheme 2 "Clinical Planning Diagram" now posted on the web-site indicates that the "Main entrance drive ramps up 25 feet. Please explain what the intended elevation is to be. Either way, this is an elevation of two stories. This clearly is automobile oriented; how does this long ramp serve the individual who arrives by public transportation? Must he or she make the trek up the ramp to gain entry at the higher elevation?"
- The diagram indicates "Patient Parking Below." What would be on the roof of this underground parking structure? Comments at the January 22 meeting raised serious questions about the cost and feasibility of an underground parking garage in New Orleans.
- This diagonal plan may maximize natural light and minimize glare, but it has absolutely no relationship to the rectilinear New Orleans street grid. This approach received very negative comments at the January 22 meeting, from government officials as well as members of the public, yet the VA continues to pursue it, ostensibly in response to "federal energy and sustainability mandates." Concerns about "energy and sustainability" would be much better served by the selecting an alternative site for the VA Medical Center that does not call for bulldozing nine square blocks of a historic neighborhood and dumping the debris in a landfill.

Comments Specific to Scheme 3

- Like Scheme 2, this scheme is unsuccessful, because it bears no relationship to its surrounding context -- a rectilinear street grid, with buildings coming to the edges of the property. The diagonal alignment of this scheme received very

negative comments at the January 22 meeting, from government officials as well as members of the public. It fails in its attempt to “provide an iconic face at the corner of Canal and Galvez,” as described in the meeting design hand-out.

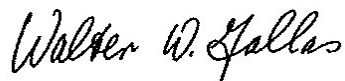
- On the hand-out distributed at the April meeting, under “Site Response,” the second text block states “Dixie Brewery façade preserved & wraps the parking garage.” This is not reflected in the “Clinical Planning Diagram,” which labels the brewery “Research.”

Comments Specific to Scheme 4

- Scheme 4 is the only one that even attempts to incorporate the historic preservation measure touted so proudly at the January 22 meeting --the relocation of historic homes to line the edge of the site along S. Rocheblave Street, for reuse as transitional living/training facilities, and lodging for veterans’ families. We were disappointed to see no more than eight token houses relocated in this manner. The VA’s March 13 response to earlier design comments states that the reuse of these existing residential structures is constrained, because their acquisition and use by the federal government would make them “federal facilities,” thus requiring handicapped access and fire codes to comply with federal standards. We find it hard to believe that these issues cannot be resolved in order to adapt historic buildings to meet modern building codes.
- As with Scheme 3, on the hand-out distributed at the April meeting, under “Site Response,” the second text block states in part “Dixie Brewery façade preserved & wraps the parking garage.” This is not reflected in the “Campus Planning Diagram” and the “Clinical Planning Diagram,” which label the brewery “Research.”

In conclusion, we urge the VA to modify the design alternatives in order to integrate a greater degree of preservation and to reduce the severity of adverse impacts on the surrounding Mid-City Historic District.

Sincerely,



Walter Gallas
Director, New Orleans Field Office



Elizabeth S. Merritt
Deputy General Counsel

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cc: Reid Nelson, ACHP
Caroline Hall, ACHP
Katry Harris, ACHP
Donald Orndoff, VA
Kathleen Schamel, FPO, VA
Dan Therrien, VA
Phil Boggan, SHPO Office
Sandra Stokes, Foundation for Historical Louisiana
Michelle Kimball, Preservation Resource Center
Bobbi Rogers, Lower Mid-City Residents & Business Owners
Virginia Blanque, Mid-City Neighborhood Organization
Mary Howell, Esq.
James R. Logan, IV, Esq.