

Planned Parenthood Center for Choice

threats.¹⁴ The current location of providers in Southeast Louisiana accords with this expectation: There is not a single abortion provider in DHH Regions 3 or 9.¹⁵ Instead, women living in these DHH Regions who need to end a pregnancy must travel to the closest urban area where an abortion provider is located. Given the lack of abortion providers in the surrounding parishes, PPCfC would undoubtedly serve patients from both inside and outside of DHH Region 1's borders. See Freedman Rep. ¶¶ 28-29.

The relevant area of Louisiana for evaluating the need for the proposed Center, therefore, is women of reproductive age (15-44) residing in Orleans, Jefferson, St. Bernard, Plaquemines, Terrebonne, Lafourche, St. Charles, St. John, St. Tammany, St. Mary and Washington parishes (the "Catchment Area").

The Need for Abortion Services in the Catchment Area

According to census data, in 2010, a total of approximately 298,343 women of reproductive age resided within the Catchment Area. Henshaw Rep. ¶ 37. This number is a conservative estimate of the population served by the proposed Center: many women living in parishes outside of the Catchment Area live in between the proposed Center and the provider in Baton Rouge, but are not included in the 298,343 number because the most populous city in that parish is slightly closer to the other provider.¹⁶

As discussed above, the rate of abortion for women living in metropolitan areas in 2010 was 20.2 abortions per 1000 women of reproductive age. Henshaw Rep. ¶ 19. The rate in 2010 for women living in non-metropolitan parishes in 2010 was 10.1 abortions per 1000 women of reproductive age. *Id.* Using the metropolitan rate for women residing in metropolitan parishes, and the non-metropolitan rate for women living in other parts of the Catchment Area,¹⁷ we would expect that approximately 5886 women residing in this area would access abortion services in any given year. Henshaw Rep. ¶ 20.

In 2010, only 3042 women residing in the Catchment Area were able to access abortion services, even though it would be expected that approximately 5886 women residing in the Catchment Area would obtain services in that year. Thus, there was an unmet need for approximately 2844 women residing in the Catchment Area in 2010. Henshaw Rep. ¶¶ 39-41 & Appendix B. An estimated 48% of women residing in the Catchment Area who would be expected to access abortion services were unable to do so. Henshaw Rep. ¶ 44.

¹⁴ See Freedman Rep. ¶¶ 5, 7; Freedman, WILLING AND UNABLE at 96-97, 111, 117 ("[W]hen doctors practice in small and/or conservative communities where abortion providers are in short supply, they feel too visible and vulnerable to provide abortion.")

¹⁵ Indeed, the existing abortion providers in Louisiana are located in the three most populous urban areas: New Orleans, Baton Rouge, and Shreveport. The clinics located in Metairie and Bossier City are part of the New Orleans and Shreveport metropolitan areas, respectively.

¹⁶ Additional parishes that are not included in the analysis, even though some women within these parishes are closer to the proposed Center than the provider in Baton Rouge, are Assumption and Tangipahoa parishes.

¹⁷ See *supra* p. 2 & note 5 for a discussion of why these rates are appropriate.

