U.S. DEPARTMENT OF VETERANS AFFAIRS

Proposed Tulsa VA Hospital
Finding of No Significant Impact

July 2022

U.S. DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT
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1. Introduction

The U.S. Department of Veterans Affairs (VA) prepared a Final Environmental Assessment (EA) to identify, analyze, and document the physical, environmental, cultural, and socioeconomic impacts associated with the VA's proposed action to acquire by donation and renovate existing buildings, construct a new building, and operate an approximately 259,000-square-foot new inpatient medical-surgical hospital facility, including space improved for medical beds, surgical beds, operating rooms, an emergency department, and approximately 495 parking spaces at 440 South Houston Avenue, Tulsa, Oklahoma 74127. The inpatient facility would employ approximately 450 staff. On property adjacent to the proposed VA project, the Oklahoma State University Center for Health Sciences (OSU-CHS) will build an approximately 150,000-square-foot 106-bed mental health hospital.

The purpose of the proposed action is to enhance and expand services to Veterans in eastern Oklahoma by providing a state-of-the-art inpatient hospital facility with medical beds, surgical beds, operating rooms, and an emergency department to meet the need for expanded Veteran health care services and improved quality of care in the VA Eastern Oklahoma Service Area.

The proposed action is needed to correct the existing gap in readily available and convenient healthcare services and allow for VA to adequately provide these services for the rapidly growing Veteran population in the VA's Eastern Oklahoma Service Area. Currently, VA health care services in the Eastern Oklahoma Service Area are provided by four community-based outpatient clinics (CBOCs)—the Ernest Childers VA Outpatient Clinic, 8921 South Mingo Road, Tulsa, OK 74133; the McAlester VA Clinic, 2 East Clark Bass Blvd., McAlester, OK; the Vinita VA Clinic, 269 South 7th Street, Vinita, OK; and the McCurtain County Clinic, 903 SE Washington Street, Idabel, OK—and one hospital, the Jack C. Montgomery VA Medical Center, 1011 Honor Heights Drive, Muskogee, OK 74401. The services provided in the CBOCs are insufficient to meet the projected needs of Veterans in the VA Eastern Oklahoma Service Area. Approximately 300,000 Veterans live in Oklahoma, of which roughly 35% live in the VA's Eastern Oklahoma Service Area, which consists of 25 counties in eastern Oklahoma. Nearly 70% of those Veterans in the Eastern Oklahoma Service Area live and work closer to 440 South Houston Avenue, Tulsa, than to the existing VA hospital in Muskogee. A VA inpatient facility in Tulsa would increase access to care for this proportion of Veterans who reside in the VA Eastern Oklahoma Service Area and for whom it is difficult or impossible to travel to the Muskogee facility to seek inpatient care. In addition, the aging of the Veteran population in Oklahoma is steadily increasing the demand for Veterans' health care services.

2. Alternatives

VA proposes to acquire via donation the existing Kerr-Edmondson State office buildings and underlying real property and renovate the structures to serve as a new inpatient medical-surgical hospital facility (the "VA Inpatient Facility") at 440 South Houston Avenue, Tulsa, Oklahoma, through the CHIP-IN process. The property would be acquired from the OSU-CHS. The VA Inpatient Facility would be developed as a collaboration between VA, the OSU-CHS, and the private

company Veterans Hospital in Tulsa, LLC (VHiT), a new company formed by private donors to serve as project manager for developing the VA Inpatient Facility.

The OSU-CHS would donate to VA 5.2 acres in downtown Tulsa, located at 440 South Houston Avenue, Tulsa, Oklahoma 74127. This property is improved with two buildings that have been evaluated by engineers to be suitable for renovation. During the renovation phase, OSU will retain ownership of the buildings and site proposed for the VA Inpatient Facility and will lease the property to VHiT. When renovations are complete, the lease to VHiT will be terminated and OSU will transfer ownership of the inpatient facility to VA.

The resulting inpatient medical-surgical hospital facility will be approximately 259,000-square-foot in size with approximately 58-beds, approximately five surgical suites, an intensive care unit, imaging, emergency services, and other VA hospital program requirements. The proposed project site includes approximately 195 existing surface parking spaces. VA will also have use of approximately 300 parking spaces in a new 700-space parking garage to be built and owned by the OSU-CHS.

Primary components of the proposed VA Inpatient Facility are:

- Renovating, constructing, and operating approximately 259,000 square feet within the existing eight-story Kerr Building and the existing four-story Edmondson Building to provide inpatient medical-surgical hospital functions, including space improvements for medical beds, surgical support, operating rooms, and an emergency department.
- Upgrading the windows on the Kerr-Edmondson buildings to meet VA medical facility requirements.
- Demolishing the existing 25,000-square-foot lobby, connecting link, and auditorium and constructing an estimated 25,000 square feet of new lobbies and connecting link.
- Resurfacing approximately 195 existing surface parking spaces.
- Constructing and operating temporary support areas (construction management trailers, material laydown areas) and utility improvements on and off the proposed project site to accommodate the facility.

VA would continue to operate the CBOCs in Tulsa, Vinita, McAlester, and Idabel and the Jack C. Montgomery VA Medical Center in Muskogee, continuing to serve Veterans at these locations as well as the proposed VA Inpatient Facility in Tulsa.

Under the no action alternative, the Proposed Action would not be implemented. VA would continue to provide Veterans' healthcare services at the existing four Eastern Oklahoma CBOCs and the Jack C. Montgomery VA Medical Center in Muskogee.

3. Affected Environment and Environmental Consequences

Based on the analysis in the Final EA, construction and operation of the VA Inpatient Facility would result in less than significant impacts.

Table 3-1 summarizes the findings of the impact analysis by resource area.

Table 3-1. Summary of Impact Analysis

Resource	Proposed Action	No Action Alternative
Aesthetics	The VA Inpatient Facility would be consistent with the aesthetics of the surrounding area and would be compatible with surrounding land uses, resulting in less than significant impacts.	None
Air Quality	Renovation and construction activities would have short-term minor impacts related to emissions and fugitive dust. Long-term minor emissions from the operation of the VA Inpatient Facility and vehicle emissions would result in less than significant impacts.	None
Cultural and Historic Resources	A Memorandum of Agreement (MOA) was signed by VA, VHiT, the OK SHPO, and the Muscogee (Creek) Nation, on January 18, 2022, to resolve the adverse effects from the renovation of the Kerr-Edmondson Buildings (Appendix C). With implementation of the mitigation measures identified in the MOA, the adverse effect of the undertaking on historic properties would be less than significant.	None
Geology and Soils	Renovation and construction activities would include ground disturbance of less than one acre. Less than significant impacts expected.	None
Hydrology and Water Quality	Less than one acre of ground disturbance expected, and project would not increase impervious surfaces beyond the existing condition. Less than significant impacts.	None
Wildlife and Habitat	The project site and vicinity do not contain suitable habitat for federally or state listed species or migratory birds of conservation concern; no adverse impacts to special status species are expected. Less than significant adverse impacts are anticipated to local common wildlife.	None
Noise	Construction activities would have noticeably higher noise levels than current levels. Operation of the VA Inpatient Facility would have a minor long-term increase in noise levels from traffic and ground maintenance. Construction and operation noise impacts would be less than significant.	None
Land Use	Converting the state office buildings to the proposed VA Inpatient Facility would be compatible with surrounding land uses. Less than significant impacts.	None
Floodplains and Wetlands	No floodplains or wetlands occur within the proposed project area. No impacts would occur.	None
Socioeconomics	Short-term beneficial impacts related to local employment and personal income during construction. Operation of the VA Inpatient Facility would enhance care for Veterans within the VA Eastern Oklahoma Service Area. Beneficial impacts and less than significant adverse impacts.	None

Resource	Proposed Action	No Action Alternative
Community Services	Minor increase in demand for fire protection, police services, and emergency services. Improved access to high quality health care for Veterans. Beneficial and less than significant adverse impacts.	None
Solid Waste and Hazardous Materials	Increased risk for unintentional releases of petroleum and hazardous materials during construction activities. Management of construction and operational waste in accordance with regulatory requirements would ensure less than significant impacts.	None
Traffic, Transportation, and Parking	Increased traffic conflicts are anticipated, adding to the existing the volume of traffic already present on Houston Ave.	None
Utilities	All utility providers have confirmed adequate local capacity to support the proposed project. Less than significant impacts.	None
Environmental Justice	No disproportionate adverse impacts to minority or low-income populations. Less than significant impacts.	None

4. Mitigation Measures

Table 4-1 summarizes the mitigation measures identified in the Final EA. Mitigation measures are project-specific requirements, not routinely implemented as part of a development project, that are necessary to reduce potentially adverse environmental impacts.

The measures listed in Table 4-1 would be implemented during construction and operation of the Proposed Action.

Table 4-1. Description and Type of Measures by Resource

Resource	Description
Cultural and Historic Resources	The following mitigation measures for the adverse effect of the undertaking on historic properties will be carried out: • VHiT will install an interior exhibit documenting, with historical information, graphics, and photographs, the significance of the facility as an Urban Renewal project and an example of the Brutalist style of architecture. • VHiT will install exterior historic markers at the two main VA Inpatient Facility entrances providing historic recognition of the significance of the facility as an Urban Renewal project and an example of the Brutalist style of architecture. • VHiT will install interpretation in the main lobby of the building recognizing the legacy of Robert S. Kerr and J. Howard Edmondson, both Veterans, for whom the original buildings were named.

Resource	Description
	• VHiT will provide designs for the interpretation to the signatories for a 15-day review and comment period prior to finalizing and procuring the interpretation measures. VHiT will install the interpretation measures prior to turning over the property to the OSU Regents for immediate transfer to VA as prescribed in the design and development agreement among VA, OSU-CHS, and VHiT.
Traffic, Transportation, and Parking	• Houston Avenue and Site Drive 5 – Construct an additional 260-foot-long left turn lane on site leading to the intersection of Site Drive 5 with Houston Avenue along with signage improvements. • Houston Avenue and Site Drive 4 (access modification) – Reconfigure the existing restricted access and coordinate with City to remove the center median to allow full access to both north and southbound lanes on Houston Avenue along with signage improvements. • Center Lane of Houston Avenue – Coordinate with City to construct a 150-foot-long northbound left-turn lane in lieu of the existing raised center median on Houston at Site Drive 4. • 7th Street and Site Drive 3 – align Site Drive 3 where it connects with 7th Street with the existing external driveway cut to the south. • Lawton Avenue and Site Drive 7 – construct a new controlled access drive to serve the loading docks on the west side of the VA Inpatient Facility building. • 7th Street and Ambulance Access Drive – reconfigure the existing access drive located just west of Site Drive 3 on 7th Street to a restricted-to-ambulances-only drive. VA will also coordinate with the City of Tulsa to seek additional improvements intended to further reduce traffic impacts to surrounding intersections. Detailed descriptions of the proposed improvements can be found in the Final EA Section 8 of the traffic analysis included in Appendix D. • Houston Avenue and 3rd Street – Request appropriate signal timing adjustments to account for traffic changes approximately two months after VA Inpatient Facility is opened. • Houston Avenue and 7th Street – Request appropriate signal timing adjustments to account for traffic changes approximately two months after VA Inpatient Facility is opened. • 7th Street and Lawton Avenue – Request modification of the northbound channelized right-turn lane to be controlled by the intersection traffic and appropriate signal timing adjustments. Signal timing adjustments should be deployed approximately two months after VA Inpatient Facility is opened.

5. Agency Coordination and Public Participation

VA consulted with appropriate federal, state, and local regulatory agencies, and federally recognized Native American Tribes. The consultation is documented in the Final EA and appendices.

VA published and distributed the Draft EA for a 30-day public comment period as announced by a Notice of Availability published in The Tulsa World on April 29, and May 1, 2022. The Draft EA was published online at https://www.cfm.va.gov/environmental/. No comments were received from the public. VA received comments from the City of Tulsa on the Traffic Study included in the EA as Appendix D. The comments were incorporated in the final version of the Traffic Study as of June 29, 2022, and are included in Appendix D.

A Memorandum of Agreement (MOA) was signed by VA, VHiT, the OK SHPO, and the Muscogee (Creek) Nation, on January 18, 2022, to resolve the adverse effects from the renovation of the Kerr-Edmondson Buildings. With implementation of the mitigation measures identified in the MOA, the Oklahoma SHPO concurred the adverse effect of the undertaking on historic properties would be less than significant.

6. Finding of No Significant Impact

After careful review of the Final EA, VA has concluded that implementation of the proposed action would not generate significant controversy or have a significant impact on the quality of the human or natural environment provided the selected developer implements the mitigation measures identified in Section 4. This analysis fulfills the requirements of the National Environmental Policy Act of 1969 and is consistent with the VA and Council on Environmental Quality regulations implementing the Act. An environmental impact statement is not required.

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7/6/2022

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Date

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July 8, 2022

Ralph T. Gigliotti, FACHE
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Date