U.S. DEPARTMENT OF VETERANS AFFAIRS
FINDING OF NO SIGNIFICANT IMPACT:
PROPOSED ACTION TO CORRECT NON-COMPLIANT SURGICAL, EMERGENCY, PHARMACY AND STERILE PROCESSING AT THE MALCOM RANDALL VETERANS AFFAIRS MEDICAL CENTER NORTH FLORIDA/SOUTH GEORGIA VETERANS HEALTH CARE SYSTEM GAINESVILLE, ALACHUA COUNTY, FLORIDA

Introduction

A Final Environmental Assessment (EA) was prepared to identify, analyze, and document the physical, environmental, cultural, and socioeconomic impacts associated with the U.S. Department of Veterans Affairs (VA) Proposed Action to correct non-compliant surgical, emergency, pharmacy, and sterile processing at the Malcom Randall VA Medical Center (MRVAMC) in Gainesville, Florida. VA prepared the Final EA in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code §§ 4321-4370h), as implemented by the Council on Environmental Quality regulations (40 Code of Federal Regulations [CFR] §§ 1500-1508); Environmental Effects of the Department of Veterans Affairs Actions (38 CFR Part 26); and VA's NEPA Interim Guidance for Projects.

Purpose and Need

The ***purpose*** of the Proposed Action is to address deficiencies in several critical patient care delivery departments, including existing space constraints, non-compliance issues, antiquated departmental designs, significant infrastructure concerns, redundancies, and additional identified inadequacies.

The Proposed Action is ***needed*** to bring the MRVAMC services into compliance with current facility codes and to provide the standard of care to Veterans in North Florida and South Georgia required to meet current and future VA strategic goals.

Proposed Action

Under the Proposed Action, VA would construct and operate a new Health Services Addition (HSA) to address existing deficiencies, supply the required amount of space, create an efficient configuration, and improve communications. The additional space (new and renovated) would correct significant issues in the existing key departments of Surgery, Pharmacy Services (inpatient and outpatient), Emergency Department (ED), Sterile Processing Services (SPS), Surgical Intensive Care Unit (SICU), Office of Information and Technology (OIT), Logistics, Health Administration Services, Prosthetics, Sensory Aid Services, Pathology, and Laboratory Medicine.

In developing the Proposed Action, VA used the Space and Equipment Planning System (SEPS) tool during conceptional and pre-design efforts for space and equipment planning purposes. The SEPS generates a Program for Design (PFD), a project-specific itemized listing of the spaces, rooms, and square foot area required for the proper operation of a specific service/department and the corresponding area for each. The HSA would meet the following “guiding principles” developed during strategic planning by MRVAMC medical staff and documented in the project’s PFD:

- Inpatient Pharmacy and Outpatient Pharmacy would be consolidated in one area to reduce redundancies and improve communications.
- The Pharmacy would be located adjacent to the Parking Garage for easy access to pick up prescriptions.
- The new Parking Garage would be in a location that reduces patients' walking distances to critical services.
- The ED would have grade level access on Level 1 while Pharmacy has grade level access on the Basement level.
- The Endovascular Operating Rooms (ORs) and support spaces would be integrated with the major Surgical OR Suite and support areas.
- Dedicated clean and soiled elevators would be planned for vertical connection to Surgery from SPS.
- The lab expansion/renovation would be adjacent to current Pathology spaces.
- The Warehouse would have a maintained service yard with adequate tractor trailer maneuvering space.
- Vertical and horizontal expansion would be incorporated into the design of the HSA.
- VA's *Physical Security and Resiliency Design Manual* (PSRDM) guidelines would be met to maintain the required setbacks for Mission Critical Services within the PSRDM requirements.

Due to space constraints at the MRVAMC, the existing Ambulatory Care Addition (ACA) located on the western portion of the campus would be demolished. The ACA is an older building with surgical services facilities that are functionally deficient due to being undersized and which do not meet national design guide standards. Thus, the ACA does not provide sufficient medical space and cannot be adequately renovated to meet the purpose and need for action. The HSA would be constructed over the approximate footprint of the prior ACA.

Under the Proposed Action, additional demolition of the following existing buildings and infrastructure would be performed:

- Building 25 (main campus electrical switchgear)
- Outbuilding structures 26 (radiation waste) and 27 (hazardous waste storage)
- Building 29 (standby emergency generator)
- Building 40 (includes switchgear serving the C, D and E Wings plus another emergency generator)
- Central Utility Plant (CUP) in the M Wing including the four below-grade fuel tanks and lines located near the main hospital and generator buildings
- Most or all of the surface parking lots Patriots, Valor, Dignity, Honor, and Heritage, including removal of the solar canopies.

The Proposed Action would also include constructing and operating the following new supporting buildings, functions, and infrastructure:

- Relocation of the loop road to provide more ground area for redevelopment and increase the safety for pedestrians traveling to and from the on-campus parking areas to the HSA.
- New 500-space parking garage (5 decks) to replace surface parking that would be displaced by the HSA and new loop road. The new garage would be located to the west of the HSA and may include a bridge connecting the garage to the HSA basement and first level. The location of the proposed garage is designed to make walking distances more manageable for patients and visitors walking to and from the HSA.

- New connecting corridor from the HSA to the main hospital building.
- A new utility addition on the south side of the E Wing to house the services previously in Building 25 (main campus electrical switchgear), Building 29 (standby emergency generator), Building 40 (includes switchgear serving the C, D and E Wings and an emergency generator), the CUP in the M Wing, and new fuel supply tanks.
- A new Central Chiller Plant to meet the expected load demand of the existing MRVAMC and the HSA.
- Relocation of major utilities currently within the planned footprint of the HSA and adjacent to the area planned for the relocated loop road.

No Action Alternative

VA also considered a **No Action Alternative**, which serves as the baseline for which the effects of the Proposed Action can be evaluated, as required by NEPA (38 CFR Part 26). Under the No Action Alternative, the Proposed Action would not be implemented. As a result, existing deficient conditions at the MRVAMC would remain unresolved for the foreseeable future. For this reason, the No Action Alternative does not meet the purpose and need for action and would diminish the level of care that VA is able to provide at the MRVAMC to Veterans in North Florida and South Georgia.

Alternatives Considered but Dismissed from Further Analysis

Renovating the ACA

VA initially considered vertically expanding the existing ACA. The renovation and expansion of the existing ACA became unfeasible because the building could not supply the required amount of space nor provide an efficient configuration to serve all proposed services.

East Campus Expansion

VA considered relocating the Warehouse to the area east of the main hospital building and south of the Tribute and Pride parking lots. Locating the Warehouse on the east side of the campus would require the demolition of Buildings 14 and 8, including the therapy pool. VA also studied the possibility of locating the ED on the east side of the campus. However, the east campus does not have the space available to accommodate the vehicular traffic and the footprint for these facilities. For these reasons, the alternative of an expansion on the east side of the MRVAMC was dismissed from further analysis.

Offsite Expansion

An off-site suit to lease facility would not allow VA to consolidate critical medical services at the MRVAMC and would not provide a direct connection to the main hospital building. Thus. Veterans' access to VA-provided medical services at the MRVAMC would not be improved. For these reasons, the alternative of an off-site alternative was dismissed from further analysis.

Potential Environmental Effects

The following table summarizes the potential environmental effects associated with implementing the Proposed Action or the No Action Alternative. The Proposed Action incorporates best management practices (BMPs), regulatory compliance, and impact minimization measures (listed in Attachment A) to ensure potential adverse impacts associated with constructing and operating the Proposed Action would remain at less-than-significant levels.

Resource Area	Proposed Action	No Action
Aesthetics		
Construction	The Proposed Action is anticipated to have a direct, short-term, less-than-significant adverse impact on aesthetics at the MRVAMC. This impact would end once the construction phase is complete.	No impact
Operation	The Proposed Action would have a long-term, direct, minor beneficial impact on aesthetics within the western portion of the MRVAMC where the new modern facilities would be located. There would be no impacts to aesthetics elsewhere at the MRVAMC.	No impact
Air Quality		
Construction	The Proposed Action would have a direct, short-term, less-than-significant adverse impact on air quality.	No impact
Operation	The Proposed Action would have a direct, long-term, less-than-significant adverse impact on air quality.	Direct, long-term, less-than-significant adverse impact on air quality
Cultural and Historic Resources		
Construction and Operation	The Proposed Action would have no impact on cultural and historic resources.	No impact
Geology, Topography, and Soils		
Construction	The Proposed Action would have no impact on geologic resource; and a direct, long-term, negligible adverse impact on topography and soil quality.	No impact
Operation	The Proposed Action would have no impact on geology or topography, and a direct, long-term, negligible adverse impact on soil quality.	No impact
Hydrology and Water Quality		
Construction	The Proposed Action would have a direct, short-term, negligible adverse impact on groundwater quality and a direct, short-term, negligible adverse impact on stormwater quality.	No impact
Operation	The Proposed Action would have no impact on groundwater quality and a direct, long-term, negligible adverse impact on stormwater quality.	No impact
Coastal Zone Management		
Construction and Operation	The Proposed Action would have no impact on Florida's coastal zone resources.	No impact

Resource Area	Proposed Action	No Action
Noise and Vibration		
Construction	The Proposed Action would have a direct, short-term, less-than-significant adverse impact on noise-sensitive receptors at the MRVAMC and a negligible impact on the surrounding community. The Proposed Action would have a direct, short-term, negligible adverse impact on vibration-sensitive receptors at the MRVAMC and no impact to the surrounding community.	No impact
Operation	The Proposed Action would have a direct, long-term, negligible adverse impact on noise-sensitive receptors at the MRVAMC and no impact on the surrounding community, and no impact on vibration-sensitive receptors at the MRVAMC or in the surrounding community.	No impact
Solid Waste and Hazardous Materials		
Construction	The Proposed Action would have a direct, long term, less-than-significant beneficial impact on RBMs, and a direct, short-term, less-than-significant adverse impact by increasing the volume of waste disposed of at an off-site landfill.	No impact
Operation	The Proposed Action would have a direct, long-term, negligible adverse impact on solid waste and hazardous materials.	No impact
Traffic and Parking		
Construction	The Proposed Action would have no impact on regional transportation, and a direct, short-term, minor adverse impact on MRVAMC traffic and parking.	No impact
Operation	The Proposed Action would have no impact on transportation or traffic conditions within or surrounding the MRVAMC, and a direct, long-term, moderate beneficial impact on parking and pedestrian safety within the MRVAMC.	The current loop road alignment would have a direct, long-term, less-than-significant adverse impact on pedestrian safety at the MRVAMC.
Utilities		
Construction	The Proposed Action would have a direct, short-term, negligible adverse impact on overall utility operations at the MRVAMC and no impact on customers outside of the MRVAMC.	No impact
Operation	The Proposed Action would have a direct, long-term, negligible adverse impact due to the increased consumption of utilities, but no impact on utility service quality within MRVAMC or to customers outside of the MRVAMC	No impact
Community Services		
Construction	The Proposed Action would have a direct, short-term, minor adverse impact on the delivery of medical and administrative support services.	No impact
Operation	The Proposed Action would have a direct, long-term, significant beneficial impact on Veteran's medical services.	Direct, long-term, significant adverse impact due to uncorrected deficiencies in medical service delivery.
Socioeconomics/ Demographics		
Construction	The Proposed Action would have a direct, short-term, minor beneficial impact on local socioeconomic conditions.	No impact

Resource Area	Proposed Action	No Action
Operation	The Proposed Action would have a direct and indirect, long-term, negligible beneficial impact on socioeconomic conditions.	No impact
Environmental Justice		
Construction	The Proposed Action overall would not significantly nor disproportionately impact vulnerable populations. However, the direct, short-term, negligible beneficial impact on local socioeconomic conditions in Gainesville and Alachua County on local socioeconomic conditions could positively impact vulnerable populations.	No impact
Operation	The Proposed Action would have a direct and indirect, long-term, negligible beneficial impact on socioeconomic conditions in Gainesville and Alachua County.	No impact
Cumulative Impacts		
Construction and Operation	The Proposed Action would have no significant adverse impacts to the resources analyzed in this EA, and a significant beneficial impact on community services as it relates to Veteran's medical care.	Direct, long-term, significant adverse impact on community services as it relates to Veteran's medical care.
Potential for Generating Substantial Controversy		
Construction and Operation	The Proposed Action is not anticipated to generate substantial controversy or lead to negative public reaction because it would bring the MRVAMC services into compliance with current VA facility codes and standard of care practices.	Significant public controversy

Agency and Public Comment

VA published a Notice of Intent (NOI) to prepare a Draft EA on August 5 and 7, 2022 in *The Gainesville Sun* and posted it on VA's website at https://www.cfm.va.gov/environmental. VA provided instructions on how the public could submit comments to be considered during development of the Draft EA. On August 4, 2022, VA emailed the NOI and a request for input from federally recognized Native American Tribes; federal, state, and local regulatory agencies; and elected officials with potential interest in the Proposed Action. On August 31, 2022, EPA submitted scoping comments regarding noise, stormwater management, management and disposal of wastes/hazardous wastes, energy conservation, and short-term air impacts.

VA published the Draft EA for a 30-day public comment period as announced by a Notice of Availability (NOA) in *The Gainesville Sun* on March 3 and 5, 2023. VA emailed the NOA to federally recognized Native American Tribes; federal, state, and local regulatory agencies; and elected officials with potential interest in the Proposed Action. Review copies of the Draft EA were made available online at https://www.cfm.va.gov/environmental/index.asp and in print at the Alachua County Library District Headquarters Library. Comments were received from the USEPA, Alachua County Environmental Protection Department, and the Florida State Clearinghouse. None of the comments received during the Draft EA review period opposed the Proposed Action.

The following comments on the Draft EA were included and addressed in the Final EA:

- On March 31, 2023, EPA stated that the Draft EA adequately addressed their scoping comments and that they had no additional comments.
- On March 29, 2023, the Alachua County Environmental Protection Department commented that any affected Underground Storage Tanks (USTs) would need to be removed and closure

assessments completed in accordance with State regulations, any replacement tanks must be registered, and that their office would need to conduct closure and install inspections. As no USTs would be affected by the Proposed Action, this comment is resolved.

- On April 14, 2023, the Florida State Clearinghouse provided the following information:
    - At least ten (10) working days prior to planned demolition of any building that removes load bearing structural members or renovation operations where asbestos may be disturbed, a completed Notice of Demolition or Asbestos Renovation form, DEP Form 62-257.900(1), shall be submitted online through the DEP Business Portal.
    - An asbestos survey conducted by a licensed asbestos inspection consultant is also required prior to any demolition or renovation.
    - This project should be reviewed by the St. Johns River Water Management District's (SJRWMD) Environmental Resource Permitting Program.

Following the Draft EA 30-day review period, VA completed the Final EA and has published a NOA of the Final EA and this FONSI in *The Gainesville Sun*. VA also emailed letters about the availability of the Final EA and FONSI to federally recognized Native American Tribes; federal, state, and local regulatory agencies; and elected officials with potential interest in the Proposed Action. The Final EA and FONSI have been made available online for download at https://www.cfm.va.gov/environmental/index.asp and in print at the Alachua County Library District Headquarters Library.

VA also completed Section 106 consultation with the Florida State Historic Preservation Office (SHPO), federally recognized Native American tribes with interests in Alachua County, FL, and potential consulting parties in the vicinity of the MRVAMC. Neither the tribes nor consulting parties responded to the Section 106 consultation letters. The SHPO concurred that the Proposed Action would have no adverse effect on cultural resources. Therefore, per 36 CFR 800, VA's responsibilities under Section 106 were fulfilled for the Proposed Action.

Finding of No Significant Impact

Based on the analyses in the Final EA, which is summarized and incorporated in its entirety by reference herein, VA concludes that implementing the Proposed Action would have no significant adverse impact on the quality of the natural or human environment within the meaning of Section 102(2)(C) of NEPA. Therefore, preparation of an environmental impact statement is not required.

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Environmental Technical Reviewer
CFM Environmental Program Office
Department of Veterans Affairs

Wende Dottor
Executive Health System Director
VA North Florida/South Georgia Health Care

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PATRICK READ Digitally signed by PATRICK READ
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VA North Florida/South Georgia Health Care

Attachment A

Management, Regulatory Compliance, and Impact Minimization Measures Incorporated into the Proposed Action

Resource Area	Description	Type
Aesthetics		
Construction	Implement dust suppression methods identified in VA Specification 01 57 19: Temporary Environmental Controls. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of dust-generating activities during sustained high wind conditions (10-40 mph with gusts at or above 50 mph).	Best Management Practice (BMP)
	Install gravel pads at the construction site exit to prevent tracking loose soil onto roadways.	BMP
	Designate a central staging area for equipment and materials that is within the construction site.	BMP
	Install construction privacy fencing between the construction area and the existing hospital grounds to reduce visual impacts to visitors and staff.	BMP
	Plant native, non-invasive, drought-resistant vegetation following grading to stabilize soils and minimize dust generation.	BMP
Operation	Professionally maintain the façades of the new HSA and parking garage.	
	Professionally maintain newly landscaped areas with native, non-invasive vegetation.	BMP
Air Quality		
Construction	Use Tier 4-compliant engines to reduce emissions of particulate matter and nitrogen oxides to meet emission standards established by USEPA.	BMP
	Limit the idling of mobile sources to three minutes.	BMP
	Implement dust suppression methods identified under Aesthetics.	BMP
Operation	Implement and maintain design processes required to achieve USGBC LEED Silver certification.	BMP
	Based on the final design for the Proposed Action, obtain any required air quality permits necessary to operate the HSA and/or boilers used to support the HSA.	Permit requirements
Cultural Resources		
Construction and Operation	The construction contractor would implement an "Inadvertent Discovery" plan to address unanticipated discoveries in the event construction activities encounter previously unknown archaeological properties.	BMP
Geology, Topography, and Soils		
Construction	Geology – The Architect/Engineer of Record (A/E) shall complete a Site-Specific Seismic Hazard Analysis as part of the design process, as required under VA H-18-8 and incorporate seismic design elements and requirements specified therein; VA Master Construction Specification 13 05 41: Seismic Restraint Requirements for Non-Structural Components; and the Unified Facilities Criteria (UFC 3-310-04).	BMP, Regulatory requirement
	Geology – Avoid blasting bedrock and causing vibrations that could impact medical services in nearby buildings at the MRVAMC.	BMP
	Topography – Ensure to the extent practicable that the site of the HSA matches the elevation of the main hospital building finished floor elevations and no internal ramps would be required for the basement and first floors.	BMP
	Soils – The A/E would apply for, obtain, and implement the terms of the FLDEP National Pollutant Discharge Elimination System (NPDES) Generic Permit for Stormwater Discharge from Large and Small Construction Activities (CGP). The construction contractor would implement and maintain permit-required BMPs for sedimentation and erosion control, including using silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, synthetic straw bales, rip-rap, and/or similar physical	BMP, Regulatory requirement

	control structures. Retain on-site vegetation to the maximum extent possible. Revegetate disturbed areas with native, non-invasive vegetation as soon as construction is completed. These BMPs would be consistent with VA's Specification 01 57 19: Temporary Environmental Controls.	
	Soils – The construction contractor shall implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site, to reduce the impacts of incidental releases of construction vehicle fluids (such as diesel or hydraulic fluids) to soil quality. Report releases of regulated quantities of petroleum-based fluids to VA and FLDEP. Perform cleanup according to applicable state regulatory requirements.	BMP, Regulatory requirement
Operation	Professionally maintain soils exposed during construction and revegetated to prevent exposure and subsequent erosion.	BMP
	Prevent soil erosion by managing stormwater through engineering controls and improvements to the MRVAMC stormwater management system.	BMP
Hydrology and Water Quality		
Construction	Conduct periodic observations of initial site preparation activities, including groundwater and surface water runoff control measures, stripping, proof-rolling of the exposed site surface after stripping, observation and testing of engineered fill, subgrade preparation testing of compaction in foundation bearing soils, and other exposed geotechnical conditions.	BMP
	If deeper drainage control structures and utility pipes are required, implement groundwater control measures to facilitate bearing surface preparation and backfilling operations if necessary.	BMP
	Assess the need for waterproofing as well as a positive permanent drainage system as part of the design and construction of basement (subsurface) levels.	BMP
	Design the Proposed Action to comply with EISA Section 438 to the maximum extent technically feasible.	Regulatory requirement
	Based on the final design of the Proposed Action, the A/E would also obtain any stormwater permits required by the City of Gainesville and ensure any modifications to the MRVAMC stormwater system comply with the City of Gainesville Engineering Design & Construction Manual Chapter 4: Stormwater Management.	Permit-required regulatory compliance
Operation	Integrate the new stormwater management infrastructure installed for Proposed Action into the overall operational and maintenance program for other MRVAMC stormwater system infrastructure., as well as adhere to any permit-required stormwater quality monitoring programs.	Permit-required regulatory compliance
Noise and Vibration		
Construction	The A/E and MRVAMC facilities staff would provide medical and administrative staff with advance information on the schedule for demolition and construction; activities and expected noise levels; and duration of activities.	BMP
	Implement VA's noise control requirements and noise management BMPs specified in VA Specification 01-57-19 Temporary Environmental Controls including but not limited to: • Using shields or other physical barriers to restrict noise transmission. • Providing soundproof housings or enclosures for noise producing machinery. • Using efficient intake and exhaust mufflers on internal combustion engines that are maintained so equipment performs below noise levels specified. • Conducting truck loading, unloading, and hauling operations so that noise is kept to a minimum. • Selecting material transportation routes as far away from sensitive receptors as possible. • Shutting down noise-generating heavy equipment when it is not needed (do not allow equipment to idle for more than three minutes).	BMP

	Comply with the City of Gainesville noise ordinance (Chapter 15) for commercial land use.	Regulatory requirement
	Perform construction activities during daylight hours on weekdays unless there is a specific activity that needs to be completed outside of this schedule to avoid impacting the staff, visitors, and patients at the MRVAMC to the extent practicable. Should such activity be necessary, the MRVAMC Public Information Office would notify sensitive receptors in advance of the work taking place.	BMP
	Comply with OSHA requirements to protect hearing of workers around loud construction equipment.	Regulatory requirement
	Should pile driving be required, coordinate with MRVAMC Director in advance and implement precautions to reduce impacts on vibration-sensitive receptors.	BMP
Solid Waste and Hazardous Materials		
Construction	Obtain a demolition permit from the City of Gainesville per Florida Building Code, Chap. 1, Sec. 105: Permits and recycle or reuse construction debris to the maximum extent practicable, as required.	Permit-required regulatory compliance
	Prior to demolishing the radiological storage outbuilding (Building 27), remove all radiological waste. If warranted, survey the emptied existing building for radiological isotopes to ensure the demolition debris is properly disposed of.	Regulatory requirement
	Submit a Notification of Demolition or Asbestos Renovation through the FLDEP Division of Air Resource Management's Online Asbestos Notification System prior to demolishing buildings containing ACM. Employ FL-licensed workers to abate ACM and transport it off-site for proper disposal.	Regulatory requirement
	Remove all identified ACM in the areas to be demolished or that are adjacent to those areas to ensure worker safety and to eliminate future ACM-related maintenance and management costs and risks. Test or abate any new materials discovered in the demolition process.	Regulatory requirement
	Prior to demolition, conduct TCLP lead testing on existing building materials, painted and unpainted, for lead. If lead is present, appropriately monitor and protect workers against lead exposure. Manage debris containing lead according to applicable USEPA regulations.	Regulatory requirement
	Sample and test building materials for PCBs. Manage and dispose of PCB waste according to applicable USEPA regulations.	Regulatory requirement
Operation	Follow VA and MRVAMC SOPs and applicable federal and state laws governing the use, generation, storage, or transportation and disposal of solid waste and hazardous materials.	Regulatory requirement
	Store radiological waste in a new, onsite, designated building as part of routine MRVAMC operational activities.	Regulatory requirement
Transportation and Parking		
Construction	Implement housekeeping measures to keep MRVAMC and surrounding roadways free of debris, as specified for Aesthetics.	BMP
	Utilize flaggers when transporting oversized vehicles to and from the construction site and entering and existing the MRVAMC, if warranted.	BMP
	Provide a combination of alternate on-site parking and temporary off-site parking to offset loss of surface parking.	BMP
Operation	Restrict the use of the new 500-space parking garage to MRVAMC visitors.	BMP
Utilities		
Construction	Design the Proposed Action to meet USGBC LEED Silver certification and VA PSRDM requirements.	BMP
	The A/E would calculate projected utility demand based on the final design of the Proposed Action, then coordinate with each utility provider to assess and ensure there is sufficient supply to meet this demand. If the A/E determines that operational utility use would result in a significant decrease	BMP

	in utility service quality, incorporate into the design a mitigation strategy and provide a monitoring and maintenance plan to ensure the mitigation remains effective over time.	
Operation	Maintain any new or upgraded utility infrastructure to ensure it operates according to the design specifications.	BMP
Community Services		
Construction	Relocate displaced medical and administrative functions to temporary swing space to avoid disrupting services.	BMP
	Provide patients with multiple types of wayfinding support to locate services in temporary swing space locations.	BMP