## STAFF REPORT

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| **Agenda Item:** | 4 | **Name:** | Polly St. John |
| **Proposed No**.: | PO 2013-0471 | **Date:** | June 3, 2014 |

**SUBJECT:**

Proposed Ordinance 2013-0471 would adopt the 2013 King County Real Property Asset Management Plan (RAMP).

**SUMMARY:**

This is the second hearing on the Executive's proposed 2013 RAMP that updates and replaces the adopted 2011 version. The RAMP that is required to be updated every two years reflects comprehensive policies for the management of all functions of real property and aligns with the goals and objectives of the county's Strategic Plan, as well as continuing to be a component of the comprehensive plan required in the Revised Code of Washington (RCW).

The 2013 RAMP covers space planning policies as well as specific locations and tenancy of county agencies and policies surrounding county space available for commercial or other non-governmental purposes. The updates to the 2011 plan incorporate the County's equity and social justice program principles by addressing gender equity – adding a policy for gender-neutral restrooms in County facilities. Additionally, the RAMP includes for the first time an industry standard for assessing facility conditions that will be used to modify the County's major maintenance financial model. The plan continues to address a series of near-term moves for county planning.

The two-volume asset management plan includes both long-range and near-term planning to address expanded policies and practices, while at the same time managing space in an environment of savings and efficiencies. The subject areas of the volumes are:

1. Plan Vision and Mission, including policies, practices and strategies. This area includes information on projects and initiatives, data driven decision making, strategic challenges, workplace readiness, equity and social justice, and actions to provide for future flexibility.
2. Near-Term Planning and Moves to address recent and proposed space consolidations related to staff forecasting

The proposed plan continues to reflect the workplace trends necessitated by budget constraints and downsizing, as well as the increased use of technology to facilitate service delivery and cost savings.

**BACKGROUND:**

The county's space plan or RAMP is considered to be the capital facility plan component of the county's comprehensive plan and King County Code (KCC) 20.12.100 requires updates to the plan every two years.

The Executive is responsible to update the current and future space needs and facility work program sections of RAMP and submit them to the Council as amendments to the county space plan by March 1 every other year. The Council is responsible to review, amend, defer or adopt the Executive proposed space plans, but is not obligated to adopt a space plan on a regular basis.

**Attachment 4** summarizes applicable King County Code (KCC) and Charter sections. It should be noted that both Executive and Council staff acknowledge that these sections need to be updated and coordinated to reflect current county policies. For instance, although current space planning documents refer regularly to a facility master plan (FMP), the KCC does not mention FMPs, but talks about “capital improvement plans” and “project program plans”. The planned rewrite of Title 4 will address the capital changes in the KCC.

Previous adopted space plans were dated in 1993, 1997, 2002, 2005, and 2011. Plan history over the last ten years is listed in **Attachment 5**.

**OVERVIEW:**

Relationship of the Space Plan to the Comprehensive Plan

The County Space Plan consisting of space standards, current and future space needs, and county facility development policy framework, is a sub-element of the public facilities element of the comprehensive plan. RCW 36.70A.070, **Attachment 6,** lists the mandatory elements that must be included in the Comprehensive Plan. The capital planning element must include:

|  |  |
| --- | --- |
| **Requirement** | **Included** |
| An inventory of existing facilities | ✓ |
| A forecast of future needs | ✓ staffing projections  ✓ for capital facilities |
| Proposed locations and capacities of facilities | ✓ for current facilities  ✓ for future facilities |
| A six-year plan that will finance the facilities | ✓ *within budget process* |
| Coordinated and consistent plans | ✓ subject to county strategic, business, and project plans |

The transmitted documents include an inventory of existing facilities (owned and leased), locations, and capacities of current facilities. County agencies have updated the initial space survey used to forecast long term needs based upon projected staffing levels and workplace trends. Essentially, these forecasts are based upon anticipated operational changes and are the agency’s best estimation of staffing needs. The Plan identifies challenges to be addressed in the next five years and sets ten strategies for moving into the future. The Plan contains current office space utilization and looks at long term strategies to position the county to respond to changing facility needs.

The RAMP, as the inventory of the County's existing general government facilities and the conditions of the buildings owned by King County, is used in support of the capital facilities element of the Comprehensive Plan. It is a reference document to Technical Appendix A to the Comprehensive Plan. In the past, the Council adopted amendments to the plan only in conjunction with either 1) the annual amendment to the Comprehensive Plan; or 2) adoption of the county budget. A striking amendment has been prepared that would include the RAMP as part of Technical Appendix A of the Comprehensive Plan – beginning in 2016. Pursuant to this proposed amendment, the RAMP would be due every four years. As noted in **Attachment 5,** space plan history,recent plans have consistently been transmitted late. With the new approach, the plan must be transmitted on time.

King County Code

The space plan is addressed in the county code in Chapters 4 and 20 – excerpts are included as **Attachment 4**. The space plan adoption is specifically addressed in Chapter 20 as part of the Comprehensive Plan where it is stated specifically that the county space plan “shall govern development of all facility master plans, facility program plans and CIP and lease requests for space housing county agency operations”.

Additionally, KCC 4.04.020, the Budget and Reporting System section states that the adopted county space plan should be the basis for capital improvement plans and project program plans. Although facility master plans are not mentioned within Chapter 4, it is generally assumed that the definitions for project program plans and FMPs are similar in nature. *Title 4 changes may need to incorporate aspects of the proposed RAMP; however it is assumed that the code requirement will continue to make it clear that the RAMP will be the overarching policy document for capital planning decisions.*

Existing Environment:

All space plans represent a “snapshot in time”, as planning decisions are influenced by on-going policy decisions. To ensure that updates are on-going, the space plan is to be transmitted every other year and is due on March 1.



**Real Property Asset Management**

Management of the county’s real property assets consists of several functions:

1. acquisition, permitting, leasing, disposal;
2. facility operations and maintenance;
3. safety, security, and disaster planning;
4. capital investment;
5. environmental sustainability; and
6. integrated work place design.

As shown in the figure, all of the functions are linked and dependent on each other.

The report provides a brief description of each function, the linkages with the County’s Strategic Plan and agency business plans, overarching goals and long term objectives and strategies.

**THE PLAN:**

The proposed 2013 RAMP is intended to inform policy, operational, and budget decisions for the county's real property, subject to the Strategic Plan and agency business plans, and to serve as the capital component of the Comprehensive Plan. As noted in the Summary Section, the plan includes policies, long and short term approaches, and all supporting appendices. It is envisioned that the plan will be updated biennially and that new sections will be added with each update to address emerging issues and practices. This "living" plan:

* Identifies the current challenges shaping the county’s facility needs.
* Acknowledges the complexity of real property management and focuses on the interrelationship of the various real property functions.
* Provides a policy framework for managing the county’s real property and proposes near term facility decisions.
* Focuses on the county’s building occupancy costs and existing vacant office space.
* Provides tools to enable managers to be active participants in reducing the county’s building occupancy costs.
* Identifies new trends in office space.
* Provides long term strategies to respond to changing facility needs.

**New to the Plan:**

1. A new section has been added in 2013 entitled "Projects and Initiatives". This section discusses major initiatives that are underway in the county to deliver services to residents. Highlighted are:

* Replacing the deteriorating Youth Services Center with a new Children and Family Justice Center.
* Preserving the Harborview Hall with its historic and cultural significance in a manner that adapts the older building to meet existing critical space needs and benefits the environment by conserving natural resources.
* Transforming Health and Human Services delivery with an emphasis on partnerships, community hubs and new ways to meet critical needs.
* Addressing the shrinking King County Road Fund with accelerated surplus property sales and office space consolidations.
* Reorganizing the delivery of public defense while assuring that the clients assisted continue to receive high-quality legal representation.

1. Another new section has also been added regarding a facility condition assessment[[1]](#footnote-1) for county buildings. Thirty general government facilities were assessed by the consulting firm MENG Analysis. (Of the thirty buildings, fifteen were built before 1980 and represents approximately half of the total square footage.) The consultant survey team made up of experienced architects and engineers updated three data sets:
2. Observed deficiencies for building systems
3. Facility condition index
4. Six and twenty year renewal forecast

Observed deficiencies were reported using the following data: 1) building system conditions, 2) system renewal data, 3) remaining useful life of systems, 4) condition scores, and 5) estimated costs to replace or repair deficient systems. The total dollar value assigned for the deficiencies is estimated at $100 million – with the 15 buildings built prior to 1980 representing 60 percent of the total cost. The top five buildings account for seventy-six percent with the King County Courthouse having the highest amount assigned:

Observed Deficiencies – Top 5 Buildings

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Building | Year Built | | Observed Deficiencies | |
| King County Courthouse | 1916 | $32,000,000 | |
| Maleng Regional Justice Center – Jail | 1997 | $20,000,000 | |
| King County Correctional Facility | 1985 | $9,000,000 | |
| Administration Building | 1970 | $8,000,000 | |
| Maleng Regional Justice Center – Court | 1997 | $8,000,000 | |

The consultants developed a Facility Condition Index[[2]](#footnote-2) (FCI) for each building. The FCI is calculated as the ratio of the estimated deferred maintenance and the six-year predicted renewals over the current replacement value[[3]](#footnote-3), expressed as a percentage. The lower the FCI, the better the overall condition; the higher the FCI, the worse the overall condition.

Buildings exhibiting a FCI of less than 10 percent are generally considered to be in good condition. Those exhibiting a FCI between 10 percent through 20 percent are generally considered in fair condition; and those with a FCI greater than 20 percent are generally considered to be in poor condition. Twelve county buildings have a FCI lower than 10 percent. The combination of the deferred maintenance and the estimated six-year renewal forecast is less than 10 percent of the buildings’ current replacement value. 15 buildings have a FCI ranging from 11.2 percent to 18.6 percent and two buildings have a FCI greater than 20 percent.

**FCI Condition Summary**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Condition | Facility Condition Index | # of Building | Total Sq. Ft. | % |
| Good | 0% to10% | 12 | 1,042,540 | 36% |
| Fair | 11%to15% | 10 | 551,770 | 19% |
| 16%to20% | 5 | 1,191,696 | 41% |
| Poor | >20% | 2 | 92,915 | 3% |

The building index is a measure showing that on-going maintenance for county buildings is being postponed or deferred due to the effects of the Great Recession and lower contributions to the Major Maintenance Reserve Fund (MMRF) from the General Fund.

The costs and FCI percentages presented by the MENG analysis are for project planning purposes and are not considered to be budget level estimates, but are to indicate the individual order of magnitude for buildings as a whole. Over time, the updated FCI can highlight changes to the overall general government portfolio as well as the needed capital investment over the near term. The collected information is being used to modify the Major Maintenance Reserve Fund financial model.

**Challenges**

The Plan specifically identifies internal and external challenges, reported in the Strategic Plan, that are likely to affect asset management. They include:

* Fiscal Constraints: While experiencing budget constraints, facility managers will need to seek ways to reduce building occupancy costs while striking a balance to respond to tenant requests, performing preventative maintenance and completing major maintenance work.
* Aging Buildings: County buildings are aging with fifty percent of general government buildings built prior to 1979. The facilities and mechanical systems are reaching or exceeding operating lives.
* Continuous Improvement: With the implementation of LEAN practices, county work processes are continually evaluated and improved, changing space usage requirements. There is also an increased use of teams and cross-unit work places and communication that changes how the county does business and uses spaces.
* Service Delivery Changes and Product Emphasis: Facility managers will need to focus on outcomes while managing service products. Also, as county population concentrates in the cities, reaching and providing local services to the unincorporated area is changing service delivery approaches and triggering facility changes.
* Technological Advancements**:** The public’s willingness to embrace new technology as well as advances in technology affecting the workplace and building systems management, “forces” changes in how and where the county delivers services and how and where the county employees work.
* Equity and Social Justice Initiative: This initiative gives greater importance to locating and managing our facilities in a manner that enables individuals and communities to reach their full potential.
* How we work together is changing**:** The increased use of teams and a mobile workforce creates a need to embrace new ways of designing office space emphasizing a variety of work stations and meeting spaces, and video conferencing to support improved employee productivity and efficiency.
* Sustainability in the Workplace: Investing in energy management is no longer optional but a functional requirement to gain anticipated savings in occupancy costs.

**Policy Framework**

Forty-two policies are established in the RAMP to clarify a framework consistent with the Strategic Plan and agency business plans. According to the RAMP, the policies are stated to ensure that real property assets and workspace activities demonstrate sound stewardship and value to county operations. This framework consists of policies contained in prior space plans, policies within various ordinances, and policies implementing the Strategic Plan.

There are three broad categories of policies: 1) those concerned with how efficiently real property is managed to support agency and department programs, 2) those that guide the near term move plan, and 3) those whose primary focus is on meeting the broader public interests, i.e., security, safety, environmental sustainability and accessibility. The policy areas are categorized and listed below:

1. Real Property Asset Management Policies
2. Financial Policies
3. Building Operations and Maintenance/Major Maintenance Policies
4. Workspace Design Policies
5. Facility Location Policies
6. Building Design Policies
7. Disaster Preparedness and Security Planning Policies
8. Sustainability Policies

Two new policies are added and seven are revised from the 2011 version. Policies that are revised clarify the language and intent of previous policies, such as removing acronyms or adding clarifying words or phrases. The new policies are:

1. **NEW**: All new construction of buildings, building purchases and major building retrofits will use life cycle cost analysis in the selection of materials and equipment ensuring that the operating, maintenance, replacement and disposal costs are considered as well as the initial costs.

This policy gives emphasis to the life cycle phases of a real property asset. Initial investment decisions must consider the cost impacts of all phases of an asset.

1. **NEW**: The policy requires gender-neutral restrooms when upgrading or building new county facilities. For existing buildings, cost-effective strategies will be used such as posting signs to identify existing gender-neutral bathrooms or posting new signs on some current gender-specific restrooms.

This policy is aligned with County’s commitment to equity and social justice.

2011 Policy 28.0 was deleted in the 2013 plan. The policy that the Sheriff's Office Criminal Investigation Division (CID) be relocated to the core complex of King County buildings in downtown Seattle was accomplished.

**Attachment 7** is an excerpt from the document that lists all RAMP recommended policies. (The excerpt reflects the corrected numbering to be replaced via an amendment.)

**Near Term Policies**

Short term move policies, listed in **Attachment 8**, address the consolidation, space utilization, and the reduction of building occupancy costs. The policies are intended to make it easier to manage the county’s office space and reduce costs overall. Successes from the 2011 RAMP include 1) the mothballing of floors 3-7 in the Yesler Building and 2.5 floors in the Blackriver Building, 2) development of a community partnership between Public Health and the King County Housing Authority in the new Greenbridge facility, and 3) the consolidations resulting in space reductions in the Administration Building by working with the Assessor and Facilities Management Division.

The 2013 RAMP lists emerging needs and potential moves and reconfigurations. Some projects, such as the Vashon Community Services Center and the relocation of the KCSO Criminal Investigations Division, were accomplished in 2013.

The list below highlights some of the outstanding space issues that have not yet been resolved:

* Department of Public Defense (DPD): The recently created DPD has the largest emerging space need. Current leases are being negotiated for the public defender services located in Kent in the vicinity of the MRJC, First Hill in the vicinity of the Youth Services Center, the Harborview campus in the vicinity of the Involuntary Treatment Act (ITA) Court, and downtown Seattle in the vicinity of the Courthouse. It is currently anticipated that the Yesler Building will be redeveloped with housing for DPD.
* Department of Adult and Juvenile Detention (DAJD) Community Corrections: The Community Corrections program, currently located in the Yesler Building, continues to grow and a needs assessment is undertaken. If the Yesler Building is redeveloped, the program will need to be relocated.
* Department of Adult and Juvenile Detention (DAJD) Work Education Release (WER): This program, currently located on the 10th floor of the Courthouse, needs tenant improvements or possible relocation.
* Public Health: Public Health has encountered severe financial constraints in 2014. The RAMP stresses the continued shift of programs to more clinical partnerships to reduce the need for Clinic services. The budget constraints will likely result in changes in services and facility needs on an ongoing basis.
* Kingstreet Center: The downsizing of the Roads Division (and the possible downsizing for Transit) has freed or will free space in the building, which may open space for the consolidation of King County Information Technology (KCIT).
* Administration Building: There is a need for training and meeting rooms in this building after the CID move.
* Involuntary Treatment Act (ITA) Court: King County’s ITA Court is currently housed in a facility that is inadequate to meet its day-to-day operating needs. The court space in the Ninth and Jefferson Building (NJB) on the Harborview Medical Center campus lacks sufficient space for every component of court operations from patient waiting areas to judge’s chambers to public restrooms. Given the inadequacies of NJB, the County is exploring moving ITA Court to a remodeled Harborview Hall.
* Lease Terminations: As leased space agreements come to the end of their term, FMD will continue to consider options for providing space in county owned buildings.

**Near Term Policy Framework**

Similar to the Framework Policies, seven near term policies were revised and two new policies are included. Most revisions clarify the language and intent of previous policies by adding clarifying words or phrases.

Revised: Policies allowing outside leasing were expanded to include service delivery for specific demographic needs. Also, the policy regarding building repairs to enhance a property sale were expanded to allow the work to be budgeted in the MMRF, consistent with a sales and marketing plan. The MMRF would be reimbursed for these costs from sale proceeds.

New Policies: Two new policies are added regarding Surplus Personal Property. The first is to reduce the excess office furniture and supplies entering the waste stream to encourage reuse and recycling. Another policy clarifies expectations for agencies at the time of a move/relocation. The overall goal of the policy is to leave a vacated space organized and free of debris.

**General Government Occupancy Costs**

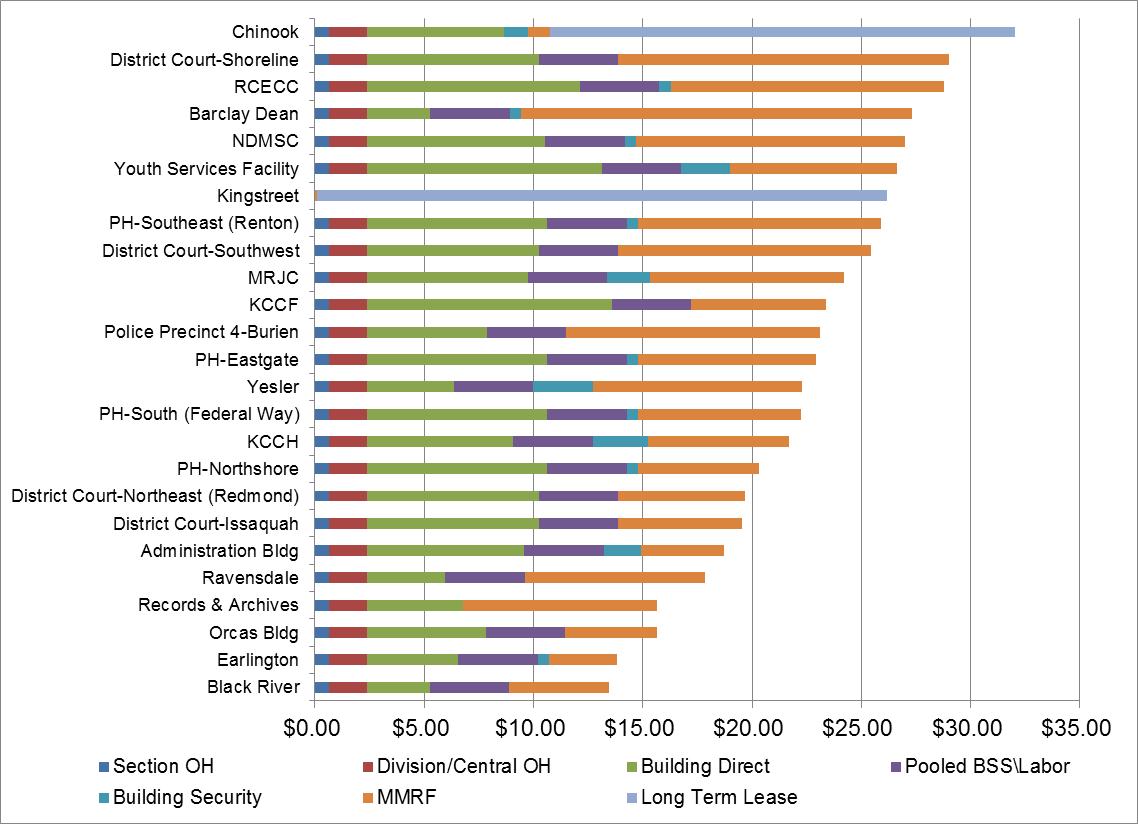
To operate and maintain general government buildings in a manner that supports the tenant business strategies and service delivery requirements, occupancy charges are levied to departments and/or funds which recover on-going operating and maintenance (O&M) costs, the imputed building rental rate, lease rates for long-term King County facility leases and costs to ensure the useful life of the building. There are four general government occupancy charges: an FMD O&M charge; a PSB building occupancy overhead charge (BOOC); a long-term lease (LTL) charge for the Chinook and King Street Center, and a major maintenance reserve fund (MMRF) charge.

When the four occupancy charges are combined, the total represents the annual facility costs for each general government building. While each charge is based on the amount of space utilized, each facility charge is billed differently:

* The O&M charge is billed by FMD to departments based on the square foot utilization in multiple buildings.
* The Building and Occupancy charge is billed by PSB to individual funds, with the charges for multiple departments and multiple buildings combined.
* The Long-Term Lease fund charge is billed by FMD to departments based on the square feet utilization.
* The MMRF charge is billed by FMD to individual funds, with the charges for multiple departments and buildings combined.

Because the charges are applied differently to different accounts included in the budget, the total impact of all charges by building is not automatically displayed. The table below displays the components of the 2013 O&M charges by building and combines the O&M charge and the MMRF for each general government building.

**2013 General Government Facility Charges**



**Workspace Utilization**

In January 2011, a Work Space Survey was undertaken to collect data about space utilization and to help inform ways to maximize space in King County buildings. Using the data combined with the building occupancy costs, the county’s work space utilization was evaluated revealing underutilized space. A series of moves were undertaken to reduce tenant building occupancy costs and to consolidate space. As of the time of the report, moves and relocations have reduced the amount of underutilized space in the last two years as shown in the table below for five general government buildings:

**Workplace Underutilization**

**Comparing 2011 to 2012**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Building** | **2011 Under Utilized** | **Percentage** | **2012 Under Utilized** | **Percentage** |
| Chinook | 54,906 | 25% | 25,036 | 11% |
| Administration | 30,349 | 21% | 27,020 | 19% |
| MRJC | 28,038 | 39% \* | 24,584 | 34% |
| Kingstreet | 49,336 | 22% | 42,336 | 19% |
| KCCH | 58,431 | 25% | 57,839 | 24% |

\*CID move to Administration Building increased underutilization to make space for

planned reconfiguration of MRJC District Court consolidation and associated moves

**Workplace Trends**

The Plan continues to acknowledge that workplaces are changing from typical enclosed office spaces, to open-floor buildings featuring furniture systems. Business practices are also changing to incorporate new technologies and are increasingly designed for flexibility and for the specific business processes they support.

These needs are met through large use of collaborative and communal spaces, increased reliance on “hot-desking” areas (workstations that are not assigned to a particular worker), and a reduction in requirements for hard-copy paper. The plan also addresses the use of technology to go paperless and to allow workplace practices such as telecommuting.

Additionally, the plan discusses the county's multi-generational workforce, diversity, demographics, instant communication and workplace environment.

**Moving into the Future**

The 2011 RAMP identified strategies to be addressed in the next five years. These strategies were intended to position the county to leverage its real property assets to benefit the county’s financial picture by aligning them with Strategic Plan and business strategies to reduce the facility costs. The 2013 plan provides updates on the progress of the strategies, most of which are still on-going. Only one was completed during the past two years, which was the workspace configuration pilot project implemented by FMD (#7).

As a reminder, the list of strategies is below:

1. Recommend a long-term asset strategy for King County’s Blackriver and Yesler Buildings, Precincts #2 and #3, and Public Health clinics by the end of 2011.
2. Commit FMD and custodial agencies to collaboratively manage the County’s dynamic real estate asset portfolio.
3. Aggressively pursue environmental sustainability, focusing on energy savings in county facilities and environmental compliance thereby saving the County money.
4. Proactively manage county workspace through comprehensive knowledge of the County’s utilization of proposed and existing leased and owned space to reduce underutilized space and tenant costs.
5. Recommend to the Executive a set aside of capital improvement funds to enable ongoing cost effective reconsolidation of work space.
6. Improve integration of FMD’s real property asset management activities through a product-focused review.
7. **Completed**: Implement an innovative workspace pilot project to learn, demonstrate, and assess the value of new workspace configurations in county workspaces
8. Partner FMD staff with county departments to better integrate facility needs with department business plans; work to right-size department workspace and to create an environment where new work trends, insights, experiences and needs can be shared.
9. Form an IT/HR/FMD alliance to develop an integrated approach to workspace design to better serve county departments and employees
10. Form an IT/FMD/RALS alliance to promote archives and records management initiatives reducing department document storage to improve space utilization.

**AMENDMENT:**

The policies listed in the transmitted Volume I are numbered incorrectly. A technical amendment has been prepared to insert a new version that corrects the numbers. There are no substantive changes in Volume I. *(Due to the size of the document, it will not be attached to this staff report.)*

Additionally, as a component of the Comprehensive Plan, the amendment would also change due dates for transmittal of the plan to be consistent with transmittal of the Comprehensive Plan, every four years, beginning in 2016.

**FUTURE CONSIDERATIONS:**

Proposed Ordinance 2013-0471 adopting the RAMP is a large body of work containing a number of policies and business practices. Some of the policies included in the RAMP will also need to be reflected in the rewrite of KCC Title 4 to ensure that the KCC is coordinated with this guiding document.

**REASONABLENESS:**

Proposed Ordinance 2013-0471 adopting the RAMP is a large body of work building on the previous policies and business practices initiated in 2011. The RAMP coordinates all aspects and functions for building management and anticipates space utilization and other integrated approaches such as technology and human resources. The document provides a wide ranging framework for near and long term management, while coordinating with the Strategic Plan and Comprehensive Plan. Approval of the proposal, as amended, would acknowledge the body of work which appears to be a reasonable business and policy decision.

**INVITED:**

1. Kathy Brown, Director, Facilities Management Division (FMD)
2. Terri Flaherty, Strategic Initiatives Unit Manager, FMD
3. Kamma Kure, Project Program Manager, FMD
4. Dwight Dively, Director, Office of Performance, Strategy and Budget

**ATTACHMENTS:**

1. Striking Amendment to Proposed Ordinance 2013-0471 *(Attachment A, dated May 20, is replaced to correct numbering problems – it is not printed with this report due to the size of the document.)*
2. Proposed Ordinance 2013-0471 (due to size, attachments are available upon request, or you may view online at: [King County - File #: 2013-0471](http://mkcclegisearch.kingcounty.gov/LegislationDetail.aspx?ID=1500771&GUID=82FA67BB-A35E-428E-AF66-2A920A082B56&Options=ID|Text|&Search=2013-0471))
3. Transmittal Letter, dated October 17, 2013
4. Applicable Space Plan References in K.C.C.
5. Space Plan History
6. Mandatory Elements of the Comprehensive Plan
7. Policy Framework
8. Short Term Policy Recommendations

1. The last time an assessment of county buildings was undertaken was 2002 in the Carter Burgess report. [↑](#footnote-ref-1)
2. FCIs are used throughout the United States to value real property. [↑](#footnote-ref-2)
3. The current replacement value is the estimated cost to reconstruct, at current prices, an existing facility with utility equivalent to the existing facility, using modern materials in compliance with current codes and regulations. [↑](#footnote-ref-3)