

April 27

I am writing to express my **strong disapproval** of the proposed changes to the ventilation code for hospitals and clinics by eliminating the 100% outside air approach.

1. 100% OA systems in hospitals and clinics in the mild California climate use less energy than recirculated systems by using heat recovery and less fan energy.
2. This ill-conceived proposal will add significant cost and complexity to any project since AHU's and ducts will increase due to increased airflow, and the need for three duct systems instead of two.
3. This proposal will take away the most important system designs for high performance hospitals and clinics. I have been designing healthcare systems in California for 34 years. The original Stanford Packard Children's Hospital built in 1987 was 100% outside air. Every health care project I do is 100% outside air. UCSF has this as a standard.
4. The 100% OA approach is key to enabling all-electric health care projects - the exhaust air can be used by heat recovery chillers to balance the heat load without boilers or cooling towers, including the use of indirect evaporative cooling.

Please drop this proposal.

Sincerely,

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