

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Steven Guttman
Date: Thursday, April 16, 2020 8:39:33 PM

Commenter Contact Information

Name: Steven Guttman
Date: 4/16/2020 12:00:00 AM
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Proposed Building Standard

Title 24 Part #: Part 4
Section #: Chapter 4, Section 4.02, Table 4-A
Proposing State Agency: OSHPD
This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):
Disapprove

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

The proposed change to Table 4-A, eliminating the option to reduce air change rates when 100% outdoor air systems are used, should be rescinded. This change is unjustified by any scientific or technical analysis. To make this change in order to conform to ASHRAE Standard 170 requirements is wrong: there are many of us arguing that the ASHRAE Standard 170 committee should adopt California's approach! In fact, this change would have a negative effect on the health, welfare and safety of the public in California:

1. This will unnecessarily increase the energy use of hospitals in California, increasing pollution and carbon emissions as a result, with the consequent impacts on public health.
2. This will increase the cost of healthcare construction in California without any demonstrable benefit.
3. Studies have shown that California hospital infection rates are not statistically different than the national average, despite the extensive use of 100% outdoor air systems in CA.

9 Point Criteria Info:
18930(a) 5